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Stanislaus County, California

FINAL REPORT

Unmet Transit Needs

Identification and Analysis
for Determination and Adoption
of Finding Prior to
Fiscal Year 1997-98
Transportation Development Act Funds Allocations

Prepared by Stanislaus Area Association of Governments
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2001 0582

TABLE OF CONTENTS

	Page
Introduction	1
Acknowledgment	1
Background	2
Unmet Transit Needs Process	2
Definition of Unmet Transit Needs	3
General Remarks Regarding Summary of Recommendations	5
Sources	6
Discussion	7
Size and Location of Groups Likely to be Dependent on Transit	7
Adequacy of Existing Services	7
Current Transit Operations in Stanislaus County	7
City of Ceres Transit System	7
City of Modesto Transit System	8
City of Patterson Transit System	8
Riverbank Oakdale Transit Authority (ROTA)	8
Stanislaus County Regional Transit System (StaRT)	8
City of Turlock Transit System	9
City of Waterford Transit System	9
Status of 1996 -97 Unmet Transit Needs	9
Public Comments and Hearings	9
Social Service Transportation Advisory Council (SSTAC) Recommendations	11
Other Recommendations	11
Analysis	14
Staff Analysis	14
Appendix A	A-1
Appendix B	B-1
Appendix C	C-1
Appendix D	D-1
Appendix E	E-1
Appendix F	F-1
Appendix G	G-1
Appendix H	H-1
Appendix I	I-1
Appendix J	J-1
Appendix K	K-1

Appendix L L-1
Appendix M M-1
Appendix N N-1
Appendix O O-1

INTRODUCTION

This is the final 1997-98 Unmet Transit Needs Report. This report is composed of: 1) the draft report, which was reviewed at a public hearing before the SAAG Policy Board at its June 11, 1997 meeting; 2) additional Appendices generated as a result of comments made by the Technical and Citizens Committees; 3) additional Appendices resulting from comments made at the public hearing; and, 4) the final resolution of the Policy Board.

The Technical and Citizens Committees reviewed the draft report at their May 28 and June 25, 1997 meetings. The draft report documented the analysis of each proposed unmet transit need. These committees recommended findings on those dates.

The Social Service Transportation Advisory Council (SSTAC) discussed the draft report and analysis at its June 5 , 1997 meeting.

The SAAG Policy Board reviewed and discussed the draft report and analysis and conducted a public hearing to receive comments regarding the analysis and recommendations on June 11, 1997. Four members of the public came to the public hearing to make comment regarding one of the proposed Unmet Transit Needs. In addition, staff read into the record the comments of two members of the public who contacted staff by telephone.

The Policy Board unanimously adopted its 1997/98 Unmet Transit Needs Resolution and adopted the Final Unmet Transit Needs Report by motion at its July 9, 1997 meeting.

ACKNOWLEDGMENT

SAAG staff would like to acknowledge the perseverance and hard work of the following members of the SSTAC:

Wendell Switzer	Evelyn Genn
Claudia Miller	Mary van Loon
John Martin	Sandy Elespuru-Bishop
Barry Smith	Georgina Bettencourt
Brian Santos	Laura Snyder

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Fred Cavanah, City of Modesto	Troy Holt, Stanislaus County
Harold Rhodes, City of Modesto	Brad Christian, Stanislaus County
Rosemarie Rocha, ROTA	Ed Penfold, ARC of Stanislaus

BACKGROUND

Unmet transit needs became a consideration for transportation planning agencies in 1978, when the Transportation Development Act (TDA) was changed to require a specific transit finding that "there are no unmet transit needs that are reasonable to meet" before local TDA funds could be allocated for other non-transit purposes.

In response to this requirement, SAAG has conducted several hearings to identify needs, and to determine reasonableness of funding new or alternative services. On August 10, 1991, the SAAG Policy Board adopted an annual Unmet Transit Needs Process for making the finding, and adopted definitions of "unmet transit needs" and "reasonable to meet." The definitions were amended September 14, 1994. The Unmet Transit Needs process was amended by the Policy Board on September 14, 1994, and is provided below for review.

Unmet Transit Needs Process

1. In accordance with Public Utilities Code Section 99401.5, and as part of the transportation planning process, SAAG must annually identify the transit needs of the jurisdictions within Stanislaus County, including:

    a. An assessment of the size and location of identifiable groups likely to be transit dependent or transit disadvantaged, including but not limited to: the elderly, persons with disabilities, and persons with limited means;

    b. An analysis of the adequacy of existing public transportation services and specialized transportation services, including privately and publicly provided services, in meeting the transit demand identified above; and

    c. An analysis of the potential alternative public transportation services and specialized transportation services and service improvements that would meet all or part of the transit demand.

2. As part of the ongoing planning process, SAAG will continue to consult with and consider the recommendations from the Social Services Transportation Advisory Council (SSTAC). SAAG staff will continue to provide support and technical assistance to the SSTAC. Prior to the statutorily-required public hearing, the SSTAC should make a written report to the SAAG Policy Board containing a summary of its recommendations, including a list of identified needs and those which the SSTAC considers reasonable to meet.

3. The Citizens Advisory Committee (CAC) and the Technical Advisory Committee (TAC) are also encouraged to submit comments and recommendations to the SAAG Policy Board regarding how identified needs can be met, whether it is reasonable to do so, and what steps are already being taken. At their own discretion, the CAC and TAC may comment on the SSTAC report or may make separate recommendations to the SAAG Policy Board.

4. The SAAG Policy Board shall hold at least two public hearings to receive testimony regarding potential unmet needs. The first of these shall be held no later than April 30th of each year. This shall not be at the same meeting at which the unmet needs finding is made. SAAG shall conduct a second public hearing following staff analysis satisfying the requirement of Public Utilities Code Section 99238.5, before making its final determinations with respect to unmet transit needs and reasonable to meet. The intent of the second public hearing is to receive comments on the staff analysis. Potential unmet transit needs heard for the first time at the second public hearing need not be analyzed or acted upon the same year. Notice of each hearing, including the date, place, and specific purpose of the hearing shall be given at least 30 days in advance through publication in one or more newspapers of general circulation. SAAG shall also send written notification to those persons and organizations which have indicated, through the SAAG citizen participation process or any other source of information, an interest in the subject of the hearing.

5. Public testimony received at the first hearing shall be compiled and evaluated by staff, together with recommendations received from the SSTAC and other citizens or groups. SAAG staff shall prepare a written analysis of potential unmet needs which have been identified and shall then recommend to the Policy Board whether or not each issue raised is an "unmet transit need" in accordance with the adopted definition. The Policy Board shall then determine whether or not unmet transit needs exist based on the adopted definition and specifically identify such needs if they are determined to exist.

6. Once SAAG has determined that a deficiency or desired improvement is an "unmet transit need," it shall determine whether it is "reasonable to meet." For each unmet need identified staff shall recommend, based on the adopted definition and comments received, whether it is reasonable to meet or not, identify reasons why it is reasonable to meet or not, and identify any steps that are already being taken to meet the need. The SAAG Policy Board may make its determination regarding reasonable to meet at the same meeting at which the finding of specific unmet needs is made, or may make this determination at a subsequent meeting. The public hearing pursuant to Public Utilities Code Section 99238.5 may be held at the same meeting (or at one of the two meetings) at which these determinations are made or at a separate meeting prior to the final determination.

7. SAAG recognizes that not all transit desires can or should be met. A single request for service is not automatically either a need or reasonable.

8. If an unmet transit need is determined by SAAG to be reasonable to meet, then the unmet transit need shall be funded before any allocation is made for streets and roads within the jurisdiction. The jurisdiction's Transportation Development Act claim shall document how the unmet transit need is being funded.

9. As with any planning process, the Unmet Needs process should evolve over time in response to changing local conditions, including growth. This Unmet Needs process and associated definitions shall be reviewed comprehensively by SAAG, the SSTAC, and other interested parties at least once every five years or more frequently if appropriate.

Definition of Unmet Transit Needs

The SAAG Policy Board adopted the current definitions of "Unmet Transit Need" and "Reasonable to Meet" by Resolution 94-39 on September 14, 1994. (Note, a copy of the resolution is attached as Appendix I.)

Definition of Unmet Transit Needs: An unmet transit need is any deficiency in the system of public transit services, specialized transit/paratransit services, and private transportation services within the jurisdictions of Stanislaus County which has been identified by community members or through a local or regional planning process and which has not been funded and implemented. At a minimum, this may include desires for transportation services which are identified through the annual TDA Unmet Transit Needs hearings, by the SSTAC, in the Regional Transportation Plan, in the Short-Range Transit Plan of any transit operator, or in the compliance plan for the Americans with Disabilities Act as prepared by any public or private entity.

SAAG recognizes that public transportation includes a broad range of users, uses, and destinations. Although some services may be restricted or give priority to traditionally transit-dependent populations (such as elderly, youths, disabled, or low-income persons), all eligible users should have equivalent access or opportunity to use the service. The transportation desires of a small group of individuals or of the clients of particular agencies shall not, in and of themselves, be sufficient to justify a finding of unmet transit need.

Trips which would duplicate transportation services to the general public are not considered unmet transit needs.

A need for transportation service beyond the fiscal year under consideration shall not be considered to be an unmet transit need at the present time.

Provision of escorts or attendants is not a transit need.

Definition of Reasonable to Meet: An identified unmet transit need can be determined to be "reasonable to meet" if it is demonstrated, based upon SAAG staff analysis or other independent evidence, that the transit need can be met within the following performance and financial standards:

The performance standards for fixed-route systems in the urbanized area is 20% fare revenue ratio and 21 passengers per vehicle service hour.

All other systems shall achieve at least the fare revenue ratio and passenger productivity standards established in the Regional Transportation Plan or as established by statute.

An extension of service shall not cause the system of which it is a part to fail to meet the systemwide performance standards. Considered separately, it shall achieve at least half the systemwide performance standards, except in the case of an extension of service determined to be a necessary lifeline service for transit dependent populations.

The unmet transit need will not require the expenditure of more than the affected jurisdiction(s) proportional share of Transportation Development Act funds that are apportioned by SAAG on the basis of population.

The determination of whether a transit need is reasonable to meet shall also take into account as appropriate:

Likely demand for service based on transit use rates per capita in comparable communities.

Whether a service to meet the need would put the system of which it is a part in jeopardy of losing state or federal funding as a result of failing to meet mandated performance or efficiency standards.

In the case of any new general public transit services, potential Americans with Disabilities Act implications within that service area, including whether or not complementary paratransit services, if required, would impose an "undue financial burden" on the public entity.

In the case of a paratransit service provided complementary to fixed-route service by a public entity, whether meeting the need would require spending a greater amount than that required by an undue financial burden waiver approved by the Federal Transit Administration under the Americans with Disabilities Act.

Opportunities for coordination among adjoining public entities or with private transportation providers and/or funding agencies. This shall include consideration of other existing resources (including financial), as well as the legal or customary responsibilities of other entities (e.g., social service agencies, religious organizations, schools, carpools, etc.). Duplication of other services or resources is unnecessary and not a prudent use of public funds.

An unmet transit need may be determined to be unreasonable to meet because it is not feasible to initiate service within the coming fiscal year, due to the time required for vehicle acquisition, planning, or similar timing factors, or because additional information is needed to determine whether or not the unmet transit need is reasonable to meet. An unmet transit need shall not be determined unreasonable to meet more than once on these grounds.

The fact that an identified transit need cannot be fully met based on available resources shall not be the sole reason for a finding that a transit need is not reasonable to meet.

The determination of whether an unmet transit need is reasonable to meet shall not be made by comparing unmet transit needs with the need for streets and roads.

General Remarks Regarding Summary of Recommendations

According to Transportation Development Act Regulations, prior to SAAG making any allocation of funds under TDA not directly related to public transportation services or facilities provided for the exclusive use of pedestrians and bicycles, SAAG as the Transportation Planning Agency, shall annually consult with the Social Services Transportation Advisory Council and identify the transit needs of the jurisdiction which have been considered as part of the transportation planning process.

According to Transportation Development Act Statues and the California Code of Regulations for 1995, Section 99238.(c) 1-3:

(c) The social service transportation advisory council shall have the following responsibilities:

(1) Annually participate in the identification of transit needs in the jurisdiction, including unmet transit needs that may exist within the jurisdiction of the council and that may be reasonable to meet by establishing or contracting for new public transportation or specialized transportation services or by expanding existing services.

(2) Annually review and recommend action by the transportation planning agency for the area within the jurisdiction of the council which finds by resolution, that (A) there are no unmet transit needs, (B) there are no unmet transit needs that are reasonable to meet, or (C) there are unmet transit needs, including needs that are reasonable to meet.

(3) Advise the transportation planning agency on any other major transit issues, including the coordination and consolidation of specialized transportation services.

The SSTAC held meetings on a monthly basis between March 1996 and February 1997, except for June and October of 1996 and January of 1997. At its December 1996 meeting, the Council reviewed the comments received and evaluated them to identify which proposals could be viewed as unmet transit needs based upon the adopted definition. At its February 1997 meeting, the Council reviewed those proposals which were recognized as potential unmet transit needs against the adopted "reasonable to meet" definition. Three proposed unmet transit needs considered reasonable to meet were identified and were presented by letter at the March 19, 1997 Public Hearing.

According to the approved SAAG process, staff is to analyze potential unmet transit needs against the adopted definitions of "unmet transit needs" and "reasonable to meet", and to recommend a finding that: 1) there are no unmet transit needs; 2) there are no unmet transit needs which are reasonable to meet; or, 3) there are unmet transit needs, including needs which are reasonable to meet.

If SAAG adopts a finding that there are unmet transit needs, and that these needs are reasonable to meet by establishing or contracting for new public transportation or specialized transportation services or by expanding existing services, then the unmet transit needs shall be funded before any allocation is made for streets and roads within the jurisdiction.

SOURCES

The following provides a listing of the documents utilized in this report and a short synopsis of what each document covers:

1990 Census
1994 Nelson/Nygaard Transit Survey Study
1993-94 Transit Systems Management Report (TSMR)
1994-95 Transit Systems Management Report (TSMR)
Regional Transportation Plan (RTP)
Social Service Transportation Inventory and Action Plan
SB 826 Social Service Transportation Progress Report
Transportation Development Act (TDA)
1990 Census Tract Maps
City and County Transit Service Maps and Brochures
Dial-A-Ride Performance Standard Study
Documentation used for the upcoming 1995-96 Transit Systems Management Report (TSMR)
Stanislaus County Tax Assessor's Maps
Stanislaus County Geographic Information System (GIS) Maps
1995-96 Unmet Transit Needs Report
1996-97 Unmet Transit Needs Report

A transit needs study was conducted and accepted by the SAAG Board in June 1991. A Transit Survey Study was conducted by Nelson/Nygaard in 1994. The information contained in the 1991 Transit Needs Study regarding the determination of the size and location of identifiable groups likely to be transit dependent is still a viable tool if the information is considered in light of 1990 Census and State Department of Finance estimates. The surveys and Census data update included in the 1994 Transit Survey Study verify most of the recommendations included in the 1991 study.

The Transit Systems Management Report is a document where information about transit operations in Stanislaus County is compiled annually. Information is organized by fiscal years. The 1994-95 Transit Systems Management Report (the most recent) provides an analysis of the existing public transportation services, including public and private services, provides a source of reference for the Unmet Transit Needs Analysis, and acts as an additional resource in responding to the requirements of the Transportation Development Act regarding existing services.

The purpose of the Regional Transportation Plan (April 1996) is to define the course of action which governmental agencies within Stanislaus County should take to achieve a balanced transportation system for both people and goods. The plan provides for both countywide transit standards and for a rural and urban transit service. The transit standards are used as measures of progress toward meeting the transit objectives of the Regional Transportation Plan.

The Transportation Development Act statutes and regulations provide information regarding the funding of public transportation through regional planning and programming agencies.

DISCUSSION

Size and Location of Groups Likely to be Dependent on Transit

The determination of the size and location of identifiable groups likely to be transit dependent, is based upon information extracted from the 1990 Census. The 1994 Nelson/Nygaard Transit Survey Study and the 1993-94 SAAG Transit Systems Management Report both include geographic analyses of those areas containing high populations and/or percentages of transportation dependent persons. More specific analysis of the populations and/or percentages of these persons can be generated from the 1990 Census data. Generally, it is not necessary to update the census analysis on an annual basis, since new data is not available each year.

Comments made at Social Services Transportation Advisory Council meetings provide information for determining the size and location of groups likely to be dependent upon transit.

It should be noted that the unincorporated areas of Stanislaus County are the most difficult to assess for transit needs. The low densities make viable transit service very difficult. Also, automobile ownership is generally higher than in urban areas, making it more difficult to assess needs based on age and income data. The overall demographic data provided by the 1994 Nelson/Nygaard Transit Survey Study and the available data provided by the 1990 Census should sustain the findings of this analysis.

Adequacy of Existing Services

The "adequacy" of existing transit is a subjective term, not addressed in the adopted definition of unmet transit needs. In practice, adequacy becomes an issue arising from the public comments received, provided the public comment is supported by knowledge of existing transit services and information available at the time. Documents useful in analyzing the proposed unmet transit needs include: the 1990 Census; the 1991 Transit Needs Study; the 1994 Nelson/Nygaard Transit Service Study; the Transit Systems Management Report; the Regional Transportation Plan; the Social Services Transportation Inventory and Action Plan; and, the Transportation Development Act statutes and regulations. Listening and talking with the public at the SAAG and the Social Services Transportation Advisory Council public hearings and meetings provides helpful insights. Transit managers, both locally and from elsewhere in the State provide a wealth of information. If appropriate public comment or adequacy of need documented by public input is not received, a transit "needs" finding may well be premature and could possibly result in the provision of a transit service which could be underutilized or possibly even unwanted by residents of the jurisdiction.

Current Transit Operations in Stanislaus County

The following is a description of the current transit operations servicing Stanislaus County and its cities:

City of Ceres Transit System

The City contracts with Laidlaw Transportation, Inc., to operate its Dial-A-Ride system. Laidlaw operates four twelve-passenger vans from 6:30 a.m. to 6:30 p.m., two vans between 6:00 a.m. and 6:30 a.m., and between 6:30 p.m. and 8:00 p.m., and two vans on Saturdays, between 10:00 a.m. and 6:00 p.m.

The City has expanded its transfer arrangements. Transfers are offered to MAX and Modesto Dial-A-Ride at the corner of Hatch and Herndon Roads. Transfers are offered to Stanislaus Regional Transit's Modesto-Turlock route at the corner of 3rd and Magnolia, and to Stanislaus Regional Transit's Westside Stage at the Social Services Center, at the corner of Hackett and Crows Landing Roads.

City of Modesto Transit System

The City of Modesto operates both a fixed route system, known as the Modesto Area Express (MAX), and a demand responsive system known as Modesto Dial-A-Ride.

The MAX system serves the City of Modesto and portions of the City of Ceres and Stanislaus County. It operates 17 regular routes and the Empire route, which it shares with Stanislaus Regional Transit. MAX routes begin shortly after 6:00 a.m., and their last routes begin shortly after 6:00 p.m., Monday through Friday, ending between 6:30 and 7:00 p.m. Eleven of those routes operate on 30 minute headways, while the others operate on one hour headways. On Saturdays, MAX operates 16 routes, three of which operate on 30 minute headways, while the others operate on one hour headways. On Sundays MAX operates ten routes, which operate on one hour headways.

The Modesto Dial-A-Ride system operates for most of the week as the Elderly/Handicapped and Americans with Disabilities Act Paratransit system for Modesto. Until 6:00 p.m., Monday through Saturday, that is the exclusive function of Modesto Dial-A-Ride. After 6:00 p.m. and all day Sunday, Modesto Dial-A-Ride functions as a general public transit service. This service functions with as many as seven dial-a-ride vehicles.

The downtown Modesto Transportation Center has been operational for several years. The center is the start and/or end point for all of the MAX and Stanislaus Regional Transit (StaRT) fixed routes and functions as the primary transfer point between those systems and the routes of each system. In addition to the MAX and StaRT buses, Greyhound, a private interregional carrier also uses the Transportation Center. The center houses 27 buses and two Dial-A Ride vans and also supplies offices and the waiting room needs of the operators. The center is also designed to accommodate a potential future passenger rail stop in Modesto.

Congestion Mitigation and Air Quality funds have been programmed for Modesto to operate a commuter transit operation from Modesto to connect with the San Joaquin County transit service which crosses the Altamont Pass to businesses in the Bay Area. This service is expected to begin during the 1997-98 fiscal year.

City of Patterson Transit System

Effective September, 1996, the City of Patterson began offering a general public Dial-A-Ride service within its city limits. The service is offered Monday through Friday, from 8:00 a.m. to 4:00 p.m. The service is currently offered in a city owned sedan; the city has plans to purchase a van or mini-bus to operate this service.

Riverbank-Oakdale Transit Authority (ROTA)

The Cities of Oakdale and Riverbank have formed the Riverbank-Oakdale Transit Authority. The transit authority operates with seven vans and began operation in June of 1995. The transit authority provides door-to-door, immediate response service to the Cities of Oakdale and Riverbank, as well as to the unincorporated territory between and closely surrounding the Cities. The service operates on Monday through Friday from 6:00 a.m. to 7:00 p.m., and on Saturday from 8:00 a.m. to 5:30 p.m. The week day service includes transit of passengers to the MAX transfer point in Modesto. Transfers are also available to Stanislaus County's Modesto-Riverbank-Oakdale Route.

Stanislaus Regional Transit System (StaRT)

Stanislaus Regional Transit operates both fixed route and dial-a-ride services. The County's fixed route services operate commuter buses connecting Modesto with: a) Ceres, Keyes and Turlock; b) Riverbank and Oakdale; c) Grayson, Westley, Patterson, Crows Landing, Newman and Gustine, and, d) Empire. The County's dial-a-ride service is divided into two systems. Central Dial-A-Ride operates two buses and serves the area between the San Joaquin River, the Merced County line, Hickman Road, the Oakdale-Waterford Highway (including all of the City Of

Waterford), the Riverbank-Oakdale Transit Authority service area boundary and the Stanislaus River. Westside Dial-A-Ride operates one bus and serves the area bounded by Interstate 5, the Merced County line, the San Joaquin River and the San Joaquin County line.

City of Turlock Transit System

The City of Turlock operates Turlock Dial-A-Ride, which provides service to both the City of Turlock and the community of Denair. The system operates a total of nine vehicles. The weekday hours of operation are 7:00 a.m. to 6:00 p.m. Saturday operations are from 9:00 a.m. to 5:00 p.m. Transfers are available to the StaRT Modesto-Turlock Route.

City of Waterford Transit System

Waterford replaced its one Dial-A-Ride van in fiscal year 1991-92. After reviewing the operational efficiency of its system, the hours of operation were reduced to five hours daily, Monday through Friday.

Status of 1996-97 Unmet Transit Needs

Appendix H provides a copy of Resolution 95-61, the 1996 SAAG Resolution stating Findings of Unmet Transit Needs for 1996-97, dated May 8, 1996. The Policy Board did not find that there were any unmet transit needs which were reasonable to meet.

Public Comment and Hearings

SAAG realizes the importance of public comment in determining the adequacy of existing transit services and has exceeded the minimum legal requirements for holding a single public hearing. The comments received are combined with knowledge of existing transit services and relevant information available to:

1. Identify and summarize potential transit needs; and
2. Evaluate transit needs for each jurisdiction.

Public hearings and comment periods are advertised and conducted by the Social Services Transportation Advisory Council (SSTAC) and SAAG. Testimony is accepted either orally or in writing.

The SSTAC is an advisory committee to SAAG. The SSTAC holds meetings to receive public input regarding potential unmet transit needs in Stanislaus County. The SSTAC has held public comment meetings for the 1997-98 TDA Unmet Needs Process on the following dates:

March 7, 1996	April 4, 1996
May 2, 1996	July 11, 1996
August 1, 1996	September 5, 1996
November 7, 1996	December 5, 1996
February 6, 1997	

At its February 6, 1997 meeting, the SSTAC formalized its list of proposed Unmet Transit Needs it considered Reasonable to Meet for presentation to the Policy Board. (See Appendix A.)

The advertisement for the SSTAC public comment period is at least one week prior to the scheduled date, in a press release. (A sample press release is included as Appendix G.)

The Policy Board Public Hearings on March 19 and June 11 were advertised by public hearing notices published 30 days in advance of the scheduled meetings. (Proof of publication for the March 19 and the June 11 meetings is included in Appendix F.)

The following is a compilation of the potential unmet transit needs heard at SSTAC meetings.

March 7, 1996
None.

April 4, 1996
None.

May 2, 1996
None.

July 11, 1996
None.

August 1, 1996
None.

September 5, 1996
Dial-A-Ride service should be available for people living in the ROTA service area to areas outside of the ROTA service area, as was provided earlier.

November 7, 1996
ROTA vans are difficult for some elderly riders to board.

ROTA should serve east of Oakdale to the Orange Blossom Bridge.

December 5, 1996
ROTA should take passengers from Oakdale to the Riverbank Amtrak Station on Saturday.

Stanislaus Regional Transit's Modesto-Riverbank-Oakdale bus on Saturday to the Vintage Faire Mall should drop passengers off on the Mall grounds, rather than across from it. It is unsafe to cross Sisk Road to get to the Mall due to the high traffic volume.

Stanislaus Regional Transit should provide daily transit from Oakdale to the Vintage Faire Mall.

There should be more marketing of the existing bus service.

The Riverbank -Oakdale Transit Authority should operate in Riverbank on Saturday. It is inconsistent to desire the Amtrak station, but not provide transit to it.

The Riverbank-Oakdale Transit Authority should operate to Orange Blossom Road.

There should be Sunday transit service in Empire.

An individual who lives on Heather Hills Lane, southeast of Oakdale, wishes to have transit service available to the area. Currently, this area is about four miles southeast of the Riverbank-Oakdale Transit Authority service area boundary, and about two miles east of the County's Central Dial-A-Ride service area boundary.

An individual who lives on Partridge Court, in the East Oakdale area, wishes to have transit service available to the area. Currently, this area is about two miles outside Riverbank-Oakdale Transit Authority service area boundary and about eight miles outside of the County's Central Dial-A-Ride service area boundary.

The Riverbank-Oakdale Transit Authority should provide service for individuals from Oakdale to Modesto regardless of trip purpose.

February 6, 1997

The Riverbank-Oakdale Transit Authority should operate to Orange Blossom Road.

Those areas which had been served by Central Dial-A-Ride but are no longer being served since the establishment of the Riverbank-Oakdale Transit Authority should be served.

These last two are the two recommended Unmet Transit Needs from the Social Services Transportation Advisory Council for 1997-98.

Social Services Transportation Advisory Council Recommendations.

Sandra Elespuru-Bishop, speaking as the Chair of the SSTAC, presented the two proposed unmet needs considered reasonable to meet, as identified by the SSTAC, to the SAAG Policy Board on March 19, 1997. The following two were listed:

1. The Riverbank-Oakdale Transit Authority should operate to Orange Blossom Road.
2. Those areas which had been served by Central Dial-A-Ride, but are no longer being served since the establishment of the Riverbank-Oakdale Transit Authority, should be served.

Other Recommendations Heard.

Mr. Dennis Snell, 1051 East C Street, Oakdale, California, Ombudsman for Stanislaus County and also a member of the Senior Advisory Commission in Oakdale, addressed the Policy Board in favor of ROTA extending its area of service to Orange Blossom Road. Mr. Snell presented a letter from Marilyn Niles, 10331 Saint Andrews Drive, Oakdale in support of the extension of the ROTA service area. Mr. Snell also presented a petition to the Policy Board, signed by 419 residents of the Oakdale area, which requested that ROTA service be extended to the East Oakdale area.

Mr. Rusty Bloom, coordinator for Valley Mountain Regional Center (VMRC), 912 Durant Street, Modesto, said some of the wheelchair clients are having problems with both Dial-A-Ride and city-transit. Mr. Matthew Thomas, co-coordinator for VMRC, was also available to speak to the Board about the problems with wheelchair clients. Incidents mentioned: sometimes a bus will stop and the driver will tell the disabled person waiting to get on the bus that the lift gate does not work on the bus. Mr. Bloom commented that if the lift does not work, the bus should not leave the yard. Also, the driver commented to the disabled person that some other type of transportation should be used if the wheel-chair wheels need to be tied down. Another problem is the body straps are not always secured by a driver when the disabled person is on the bus. Drivers do not seem to be making the effort to understand what the client is saying, when the client has a speech difficulty.

Mr. Warren Brumley, 440 E Street, Empire, Chairman of the Empire Municipal Advisory Council, addressed the Board regarding bus service. Public Transportation is currently available to and from Empire five days a week/five times a day, however, with the upcoming changes in welfare - trying to get people to work, more transportation will be needed. He suggested seven days a week. He also noted the need to address the possibility of more public access to buses. He would like to see more out in the County.

Mr. Edwin Penfold, employment specialist for the ARC of Stanislaus County, 1424 Stonum Road, Modesto. The ARC of Stanislaus serves disabled persons in the County of Stanislaus and the majority of ARC consumers do not drive. Transportation is a key issue of his job. He tries to find employment for people, and a position may be available, but the person cannot be placed because of a lack of transportation. He presented five proposals to the Board:

1. Increase Modesto Area Express hours - Monday through Friday - 5:00 a.m. to 12:00 Midnight, Saturday - 6:00 a.m. to 10:00 p.m.
2. Modesto Dial-A-Ride should extend service into the Business Park area off Highway 99 in Salida and extend hours to midnight.
3. Stanislaus County should increase the hours of service between Modesto and Turlock to 5:00 a.m. to midnight.
4. Increase runs to the Empire area and the hours of operation - 5:00 a.m. to midnight.
5. Establish runs between the Modesto Airport, Yosemite Boulevard, and Finch Road area and hours of operation from 5:00 a.m. to midnight.

Mr. Bruce Frohman, Chairman of the SAAG Citizens Advisory Committee, mentioned that Bay Area Rapid Transit (BART) is extending service to Pleasanton on May 10 and could provide a great opportunity to increase the use of public transit. Specifically, he would like to see direct bus service provided from the downtown Turlock and downtown Modesto transportation centers to the BART station in Pleasanton. Mr. Frohman suggested approaching the Greyhound Company to see if a Greyhound Bus could stop at the Pleasanton station and not go direct to downtown San Francisco. Another possibility would be to link our County transit system with the San Joaquin County Transit System, which he understood would be providing direct service from Stockton to Pleasanton.

One additional request was received by staff prior to the public hearing which staff errantly failed to read into the record: A resident on 28 Mile Road, about ½ mile north of Rodden Road, desires to have ROTA serve that area.

The following list organizes the proposals by jurisdiction:

Jurisdiction	Potential Need
Modesto	Service on MAX should be extended from 5:00 a.m to midnight, Monday through Friday, and from 6:00 a.m. to 10:00 p.m. on Saturday.
Modesto	Modesto Dial-A-Ride should extend service into the Business Park area off Highway 99 in Salida and extend the hours to midnight.
Stanislaus County	Increase runs to the Empire area to seven days a week, 5:00 a.m. to midnight, Monday through Friday, 6:00 a.m. to 10:00 p.m., weekends.
Stanislaus County and Modesto	Establish transit between the Modesto Airport, Yosemite Boulevard, and Finch Road, with hours of operation from 5:00 a.m. to midnight.

Stanislaus County and ROTA

Provide service to the East Oakdale area, east to Orange Blossom Road.

Stanislaus County and ROTA

Provide service ½ mile north of Rodden Road along 28 Mile Road.

Stanislaus County and ROTA

People who live in the ROTA service area should be provided transit directly to other areas in the County, as they were before the creation of ROTA.

Stanislaus County Increase service between Modesto and Turlock and hours of operations from 5:00 a.. to midnight.

Modesto and Stanislaus County

Provide or arrange for direct transit connection to either the Pleasanton BART station or to the San Joaquin Regional Transit service to that BART station.

Staff notes that the comments presented by Mr. Rusty Bloom regarding the problems of wheelchair clients is a legitimate concern, but does not fall under the review of the unmet transit needs process. Staff has informed each of the transit managers in the County of the rudeness of some drivers which Mr. Bloom has communicated to the Policy Board. Rudeness is never acceptable and the managers are all concerned about the treatment of the passengers.

ANALYSIS

Staff Analysis

The following are SAAG staff analyses of the proposed Unmet Transit Needs as identified by the Social Services Transportation Advisory Council, and as mentioned at the March 19, 1997 Public Hearing:

City of Modesto

1. *MAX should operate from 5:00 a.m. to Midnight, Monday through Friday, and from 6:00 a.m. to 10:00 p.m. on Saturday.*

FIND: This is an unmet transit need which is not reasonable to meet.

Responsible Jurisdictions: Modesto directly, Stanislaus County indirectly.

Discussion:

Note: At the Technical Committee Meeting, the City of Modesto asked staff to prepare a statement explaining why the ARC of Stanislaus should not be considered a "small group" for purposes of the Unmet Need definition. The response of staff is included in Appendix N. This note also applies to proposals #3, #4, and #8.

a. **Definition:** Paragraph 1 of the Definition of Unmet Transit Needs states that a proposal identified through the annual TDA Unmet Transit Needs hearings may be included as an Unmet Transit Need.

Finding: This proposal was identified by the ARC of Stanislaus in the annual TDA Unmet Transit Needs public hearing.

b. **Definition:** Paragraph 2 of the Unmet Transit Needs definition says, "The transportation desires of a small group of individuals ... shall not, in and of themselves, be sufficient to justify a finding of unmet transit need."

Finding: This proposal was presented by the ARC of Stanislaus, an organization which trains more than 100 disabled individuals, and works with organizations with more than 100 additional clients (please see letters from ARC of Stanislaus in Appendix E), most of whom are transit dependent. Staff recommends a finding that this is not "a small group of individuals", and recommends that this be found to be an unmet transit need.

c. **Definition:** Paragraph 3 of the Unmet Transit Needs definition says, "Trips which would duplicate transportation services to the general public are not considered to be unmet transit needs."

Finding: The proposed service would duplicate existing general public service offered by Modesto Dial-A-Ride from 6:00 p.m. to 11:00 p.m. However, the period before 6:00 a.m. and after 11:00 p.m. Monday through Friday, and after 5:00 p.m. on Saturday is not duplicative. Staff recommends a finding that this is an unmet transit need.

d. Paragraph 4 of the Unmet Transit Needs definition relates to proposals for future transit service, and is not applicable to this proposal.

e. Paragraph 5 of the Unmet Transit Needs definition relates to proposals for escort service, and is not applicable to this proposal.

Conclusion: Staff recommends this be found to be an Unmet Transit Need.

f. **Definition:** Paragraph 1.a of the Reasonable to Meet definition indicates that this proposed unmet transit need cannot be considered Reasonable to Meet if MAX, as a system, is currently operating at below a 20% fare revenue ratio and is currently carrying fewer than 21 passengers per vehicle service hour.

Finding: The 1995-96 City of Modesto report for MAX indicates that MAX had a 25% fare revenue ratio and carried an average of 28.81 passengers per vehicle service hour during that fiscal year. The proposal can be considered reasonable to meet based upon this paragraph.

g. Paragraph 1.b of the Reasonable to Meet definition does not apply to this proposal.

h. Paragraph 1.c of the Reasonable to Meet definition establishes two requirements for this proposal:

1. **Definition:** "An extension of service shall not cause the system ... to fail to meet the systemwide performance standards."

Finding: The Regional Transportation Plan indicates that MAX should maintain a minimum fare revenue ratio of 20%, and should attempt to maintain Cost-per-Passenger, Cost-per-Hour, Cost-per-Mile, Passenger-per-Mile and Hours-per-Employee performance ratios which are more efficient than the average for comparable systems statewide, as indicated in the annual Transit Productivity Analysis. As indicated above, the 1995-96 fare revenue ratio for MAX was 25%. The proposed extension of services would add approximately 880 hours to the MAX schedule per week, an amount which would cost about $2,293,000 per year. In a worst case scenario - i.e., there were no passengers riding on MAX during these new hours of operation, the fare revenue ratio for MAX as a whole would drop to 16.7%. In order to prevent MAX's fare revenue ratio as a system from dropping below 20%, the ridership during the new hours would have to generate approximately $228,500 in fares. The average fare per passenger during 1995-96 was $0.43. To generate $228,500 in fares would require 531,368 passengers annually during those hours, or about 10,219 passengers per week, or just under 11.6 passengers per vehicle service hour. It should be noted that MAX's last hour of the day currently averages under five passengers per vehicle service hour.

The 1995-96 Transit Productivity Analysis (a part of the Transit Systems Management Report, which is still in production, though the statistics have been processed for the analysis) identifies the following mean levels of productivity for urban fixed route transit systems carrying between 1 million and 8 million passengers during the 1994-95 fiscal year, the most recent for which there are statewide records: 1) $/Passenger = $2.05. In 1995-96, MAX averaged $1.72/passenger. For MAX to maintain an average cost per passenger of $2.05 or less, there would have to be about 695,100 passengers riding during those additional hours, or 15.2 passengers per vehicle service hour, more than triple the average current passengers per vehicle service hour during the last hour of service. 2) $/Hour and, 3) $/Mile would not be directly impacted by this proposal. 4) Passengers/Mile mean = 2.27. In 1995-96 MAX carried only 2.07 passengers per mile, down from 2.32, 2.33, and 2.45 passengers per mile in the prior years. This means the ridership during the additional hours would have to be higher than the current hours of operation if MAX performance is to exceed the standards in the Regional Transportation Plan. Staff recommends a finding that this proposal is not reasonable to meet based on this definition point.

2. **Definition** "Considered separately, it shall achieve at least half the systemwide performance standards, except in the case of an extension of service determined to be a necessary lifeline service for transit dependent populations." This would require this proposal, by itself, to achieve at least a 10% fare revenue ratio, and at least 10.5 passengers per vehicle service hour.

Finding: For this service to operate at a 10% fare revenue ratio during the extended hours would require annual fares of approximately $229,300 to be generated by the riders during the extended hours. With an average fare rate of $0.43, as was collected in 1995-96, this would require about 533,250 passengers during those hours of operations. This would require an average of about 11.7 passengers per vehicle service hour, which is over double the current hourly ridership of the last hour of MAX's schedule. The standard of 10.5 passengers per vehicle service hour during the new hours of operation is also more than double the current hourly ridership of the last hour of MAX's schedule. Staff recommends a finding that this proposal is not reasonable to meet based on this definition point.

i. **Definition:** Paragraph 1.d of the Reasonable to Meet definition indicates that the unmet transit need will not require the expenditure of more than the affected jurisdiction's proportional share of Transportation Development Act funds that are apportioned by SAAG on the basis of population.

Finding: The City of Modesto currently is allocated $3,996,996 of Transportation Development Act "Local Transportation Funds". These funds are allocated to fund transit needs in Modesto, and additional projects as allowed in the Transportation Development Act. Approximately $3,059,236 of City of Modesto Local Transportation Funds were spent in 1995-96 on the combined operations of MAX and Modesto Dial-A-Ride. The proposed service expansion of MAX would cost approximately $2,293,000 per year. Staff recommends a finding that this proposal would cause the City of Modesto to spend more Transportation Development Act funds than are apportioned to the City of Modesto, and that this proposal is not reasonable to meet based upon this point.

j. **Definition:** Paragraph 2.a of the Reasonable to Meet definition says the determination of whether a transit need is reasonable to meet shall also take into account as appropriate the likely demand for service based on transit use rates per capita in comparable communities.

Finding: The most similar fixed route operations to MAX in the San Joaquin Valley operate in Stockton, Fresno, and Bakersfield. None of these systems operate fixed route buses after 8:00 p.m. Staff recommends that this proposal be found not reasonable to meet based on this definition.

k. **Definition:** Paragraph 2.b of the Reasonable to Meet definition says the determination of whether a transit need is reasonable to meet shall also take into account as appropriate whether a service to meet the need would put the system of which it is a part in jeopardy of losing state or federal funding as a result of failing to meet mandated performance or efficiency standards.

Finding: As noted above, this proposal could, and it is statistically probable that it would, cause MAX to operate at less than a 20% fare revenue ratio. If this were to continue for more than two years, this would place Modesto in jeopardy of losing some state transit funding. Based on this definition point staff recommends this proposal be found not reasonable to meet.

l. **Definition:** Paragraph 2.c of the Reasonable to Meet definition says the determination of whether a transit need is reasonable to meet shall also take into account as appropriate the potential Americans with Disabilities Act (ADA) implications within that service area, including whether or not complementary paratransit services, if required, would impose an "undue financial burden" on the public entity.

Finding: Because the City of Modesto already operates Modesto Dial-A-Ride until 11:00 p.m., which is an ADA service during daytime operations, the extension of MAX until midnight would only result in the conversion of the evening Dial-A-Ride service from a general public to an ADA service. Based on this point this proposal can be found reasonable to meet.

m. Paragraph 2.d of the Reasonable to Meet definition is not applicable.

n. **Definition:** Paragraph 2.e of the Reasonable to Meet definition says the determination of whether a transit need is reasonable to meet shall also take into account as appropriate opportunities for coordination among adjoining entities or with private transportation providers and/or funding agencies. This shall include consideration of other existing resources (including financial), as well as the legal or customary responsibilities of the other entities (e.g., social service agencies, religious organizations, schools, carpools, etc.). Duplication or other services or resources is unnecessary and not a prudent use of public funds.

Finding: It first should be noted that the proposed service would duplicate the general public Modesto Dial-A-Ride services currently offered to most of the MAX service area. Though that service would presumably become an ADA service if MAX were extended to midnight, the duplication of the current Modesto Dial-A-Ride service could be interpreted to make this proposal not reasonable to meet. With that stated, it should be noted that no other public transit services operate in the Modesto area during the requested hours. Private local services include taxi companies (three operate in Modesto), and contract bus operators (there are several in the Modesto area). Several social service agencies operate their own vehicles, including ARC of Stanislaus, but staff has no data regarding the availability of those vehicles to provide the service requested in this proposal. Staff has no data about the ability of religious organizations to provide this transit. Schools typically do not operate their vehicles during the hours indicated in this proposal, but the transportation of adults to their jobs is not typically considered a responsibility of schools. Staff cannot speculate about the availability of carpools to provide the transportation requested in this proposal.

o. **Definition:** Paragraph 3 of the Reasonable to Meet definition says an unmet transit need may be determined to be unreasonable to meet because it is not feasible to initiate service within the coming fiscal year, due to the time required for vehicle acquisition, planning, or similar timing factors, or because additional information is needed to determine whether or not the unmet transit need is reasonable to meet. An unmet transit need shall not be determined unreasonable to meet more than once on these grounds.

Finding: This service is feasible to initiate within the coming fiscal year. This proposal can be found reasonable to meet based upon this paragraph.

p. **Definition:** Paragraph 4 of the Reasonable to Meet definition says the fact that an identified transit need cannot be fully met based upon available resources shall not be the sole reason for a finding that a transit need is not reasonable to meet.

Finding: This is understood. This analysis proposes that the requested transit service cannot be funded with available resources, but also lists several other reasons to consider this proposed unmet transit need to be not reasonable to meet.

q. **Definition:** Paragraph 5 of the Reasonable to Meet definition says the determination of whether an unmet transit need is reasonable to meet shall not be made by comparing unmet transit needs with the need for streets and roads.

Finding: This is understood. This analysis contains no reference to streets and roads.

Based upon the above analysis, staff recommends a finding that the proposed transit service is not reasonable to meet.

City of Modesto

2. *Modesto Dial-A-Ride should extend service into the Business Park east of Hwy 99 in Salida. Its service hours should be extended to midnight. Swing shift work is available until 10 p.m.*

FIND: This is not an unmet transit need.

Responsible Jurisdiction: Stanislaus County directly, and the City of Modesto indirectly.

Discussion: Effective April 9, 1997 Modesto Dial-A-Ride serves that business park. Therefore this cannot be considered to be an unmet transit need.

Stanislaus Regional Transit

3. *Increase runs to the Empire area to seven days a week, 5:00 a.m. to midnight, Monday through Friday, 6:00 a.m. to 10:00 p.m., weekends.*

FIND: This is an unmet transit need which is not reasonable to meet.

Responsible Jurisdiction: Stanislaus Regional Transit.

a. **Definition:** Paragraph 1 of the Definition of Unmet Transit Needs says a proposal identified through the annual TDA Unmet Transit Needs hearings may be included as an Unmet Transit Need.

   Finding: This proposal was identified by the ARC of Stanislaus in the annual TDA Unmet Transit Needs public hearing.

b. **Definition:** Paragraph 2 of the Unmet Transit Needs definition says, "The transportation desires of a small group of individuals ... shall not, in and of themselves, be sufficient to justify a finding of unmet transit need."

   Finding: This proposal was presented by the ARC of Stanislaus, an organization which trains more than 100 disabled individuals, and works with organizations with more than 100 additional clients (please see letters from ARC of Stanislaus in Appendix E), most of whom are transit dependent. Staff recommends a finding that this is not "a small group of individuals", and recommends that this be found to be an unmet transit need.

c. **Definition:** Paragraph 3 of the Unmet Transit Needs definition says, "Trips which would duplicate transportation services to the general public are not considered to be unmet transit needs."

   Finding: While it can be argued that the proposed service would duplicate existing general public service offered during part of that time by Modesto Dial-A-Ride, the period before 6:00 a.m. and after 11:00 p.m. Monday through Friday, and after 5:00 on Saturday is not duplicative, so this can be called an unmet need based on this point. Staff recommends a finding that this is an unmet transit need.

d. Paragraph 4 of the Unmet Transit Needs definition relates to proposals for future transit service, and is not applicable to this proposal.

e. Paragraph 5 of the Unmet Transit Needs definition relates to proposals for escort service, and is not applicable to this proposal.

Conclusion: Staff recommends that this proposal be found to be an Unmet Transit Need.

f. Paragraph 1 of the Reasonable to Meet definition is not considered applicable to this proposal (the Empire route is counted as a rural route in the Regional Transportation Plan).

g. **Definition**: Paragraph 1.b of the Reasonable to Meet definition indicates that this cannot be considered Reasonable to Meet if Stanislaus Regional Transit, as a system, is currently operating at below the fare revenue ratio and passenger productivity standards established in the Regional Transportation Plan, or as established by statute.

Finding: The Regional Transportation Plan has established a 10% minimum Fare Revenue Ratio for Stanislaus Regional Transit. There is no passenger productivity standards adopted in the Regional Transportation Plan or by statute. In 1995-96 Stanislaus Regional Transit maintained a fare revenue ratio of 11.7%. Based on this point this proposal can be found reasonable to meet.

h. Paragraph 1.c of the Reasonable to Meet definition establishes two requirements for this proposal:

1. **Definition:** "An extension of service shall not cause the system ... to fail to meet the systemwide performance standards."

Finding: The Regional Transportation Plan indicates that Stanislaus Regional Transit should maintain a minimum fare revenue ratio of 10%, and should attempt to maintain Cost-per-Passenger, Cost-per-Hour, Cost-per-Mile, Passenger-per-Mile and Hours-per-Employee performance ratios which are more efficient than the average for comparable systems statewide, as indicated in the annual Transit Productivity Analysis. As noted above, Stanislaus Regional Transit fixed routes currently operates at above the required 10% fare revenue ratio minimum. Stanislaus Regional Transit staff estimates the proposed additional service would cost the County approximately $99,491 per year to operate. This estimate is based on the assumption that the request is for three additional runs to Empire, Monday through Friday, and five runs per day on weekends - a total of 25 additional runs per week. In 1995-96 Stanislaus Regional Transit received about $116,347 in fares. If, assuming a worst case scenario, no passengers were to ride this new service for an entire year, Stanislaus Regional Transit would maintain a 10.6% fare revenue ratio. The second half of the criteria is difficult to analyze, as the Regional transit system is both a fixed route and demand responsive service, which are measured against different standards in the Transit Productivity Analysis. However, based upon the systemwide fare revenue ratios, staff recommends it be found reasonable to provide transit service to this area.

2. **Definition** "Considered separately, it shall achieve at least half the systemwide performance standards, except in the case of an extension of service determined to be a necessary lifeline service for transit dependent populations." This would require this proposal, by itself, to achieve at least a 5% fare revenue ratio, cost no more than $9.86 per passenger, cost no more than $95.22 per hour, cost no more than $4.12 per mile, and carry at least 0.22 passengers per vehicle-mile (1 passenger every 4.55 miles). These standards can be waived by the Policy Board if it determines that this service is a necessary lifeline service for a transit dependent population.

Finding: For this new service to operate at a 5% fare revenue ratio would require annual fares of approximately $4,975 to be generated by the riders during the first year of operation. With an average fare rate of $0.41, as was collected in 1995-96 on the Empire Route, this would require 12,133 or more passengers during the first year of operation, or 9.33 passengers-per-vehicle-service-hour (note, late afternoon MAX run averaged between 2 and 4 passengers-per-vehicle-service-hour during the months documented, and late evening and weekend runs would not be expected to exceed this performance). If the proposed service costs $99,491 per year, it would require at least 10,090 passengers per year to satisfy the cost per passenger standard (note, this would again require 7.76 passengers-per-vehicle-service-hour). The proposed service

cost is less than the $123,786 which $95.22 per hour would allow. The proposed cost-per-mile standard is $4.94, whereas Stanislaus Regional fixed route only cost $2.39 per mile in 1995-96. The proposed expansion would be approximately 15,600 miles; to satisfy the requirement of 0.22 passengers-per-vehicle-service-mile, the service would have to carry at least 3,432 passengers, which would still be an average of at least 2.64 passengers per trip. Staff recommends that it not be found reasonable to meet this transit need based upon this paragraph.

i. **Definition:** Paragraph 1.d of the Reasonable to Meet definition indicates that the unmet transit need will not require the expenditure of more than the affected jurisdiction's proportional share of Transportation Development Act funds that are apportioned by SAAG on the basis of population.

Finding: Stanislaus County currently is allocated $2,304,460 of Transportation Development Act "Local Transportation Funds". These funds are allocated to fund transit needs in Stanislaus County, and additional projects as allowed in the Transportation Development Act. Approximately $650,000 of Stanislaus County Local Transportation Funds were spent in 1995-96 on the operation of Stanislaus Regional Transit. The proposed service would cost approximately $91,915 per year . Staff recommends that it be found reasonable to meet this need based upon this paragraph.

j. **Definition:** Paragraph 2.a of the Reasonable to Meet definition says the determination of whether a transit need is reasonable to meet shall also take into account as appropriate the likely demand for service based on transit use rates per capita in comparable communities.

Finding: The most reasonable comparison in this county is the community of Empire itself. Because it already has a daytime transit service five days per week, the evening ridership and the weekend ridership can be estimated based on the current daytime ridership patterns and totals. MAX monthly records indicate that ridership is closely related to the demand of students. The first and second MAX buses which operate on this route are timed to correlate to the opening and closing of Johansen High School. The August, October and December statistics are indicative of this pattern. In August (during Summer break) the first run averaged 10.58 passengers-per-vehicle-service-hour; the second run averaged 6.57 passengers-per-vehicle-service-hour, and the third run (which leaves downtown at 5:10 p.m.) averaged 3.99 passengers-per-vehicle-service-hour. In October the statistics were 16.72, 22.22, and 2.40. Finally, in December, the statistics were 12.51, 10.89, and 3.30. The trend consistently demonstrates a pattern that ridership on this route is largely students, arriving at and leaving school. These statistics can be correlated with the passenger-per-vehicle-service-mile figures by noting that the busiest monthly Empire run reported by MAX only carried 1.77 passengers-per-vehicle-service-mile, and of the nine noted above, the average was just under 0.75 passengers per vehicle service mile.

It should also be noted that staff was not able to find any late evening fixed route transit operated in comparable rural areas elsewhere in the state. A staff survey of rural fixed route transit services found the latest service in Sonoma County, and that was only until 11:00 p.m. Otherwise, Sunline Transit operates a line to Palm Springs at 9:30 p.m., San Luis Obispo County Transit operates a line to the Community College at 9:00 p.m., Mendocino County Transit operates a line returning from Santa Rosa which arrives at Willits at 7:40 p.m. Based on this paragraph staff recommends a finding that this proposal is not reasonable to meet.

k. **Definition:** Paragraph 2.b of the Reasonable to Meet definition says the determination of whether a transit need is reasonable to meet shall also take into account as appropriate whether a service to meet the need would put the system of which it is a part in jeopardy of losing state or federal funding as a result of failing to meet mandated performance or efficiency standards.

Finding: As indicated in the above analyses of efficiency, it is not expected that this service would cause Stanislaus Regional Transit to violate any mandated state performance or efficiency standards. Staff is not aware of any federal

standards which the County must meet. It can be found reasonable to meet this unmet transit need based upon this paragraph.

l. **Definition:** Paragraph 2.c of the Reasonable to Meet definition says the determination of whether a transit need is reasonable to meet shall also take into account as appropriate the potential Americans with Disabilities Act implications within that service area, including whether or not complementary paratransit services, if required, would impose an "undue financial burden" on the public entity.

Finding: The proposed service area is already served by Modesto Dial-A-Ride, an existing paratransit service which satisfies the Americans with Disabilities Act. It can be found reasonable to provide transit service to this area based upon this paragraph.

m. Paragraph 2.d of the Reasonable to Meet definition is not applicable.

n. **Definition:** Paragraph 2.e of the Reasonable to Meet definition says the determination of whether a transit need is reasonable to meet shall also take into account as appropriate opportunities for coordination among adjoining entities or with private transportation providers and/or funding agencies. This shall include consideration of other existing resources (including financial), as well as the legal or customary responsibilities of the other entities (e.g., social service agencies, religious organizations, schools, carpools, etc.). Duplication or other services or resources is unnecessary and not a prudent use of public funds.

Finding: There is opportunity for coordination with MAX and the three existing taxi services which serve the area. Other existing resources which serve the area include the Empire School District, which provides school busing for the elementary students, and the Valley Mountain Regional Center, which contracts for transportation for its clients. Staff has no knowledge of how those vehicles could be used to offset the fixed route transit service which has been requested by the ARC of Stanislaus, but encourages a documentation of the use of those vehicles prior to further requests for use of public vehicles to operate on this route. Staff has no documentation of carpools which are operating in the area and available to transport transit dependent persons to Modesto. Staff also has no documentation of religious organizations offering that service. It can be found reasonable to provide transit service to this area based upon this paragraph.

o. **Definition:** Paragraph 3 of the Reasonable to Meet definition says an unmet transit need may be determined to be unreasonable to meet because it is not feasible to initiate service within the coming fiscal year, due to the time required for vehicle acquisition, planning, or similar timing factors, or because additional information is needed to determine whether or not the unmet transit need is reasonable to meet. An unmet transit need shall not be determined unreasonable to meet more than once on these grounds.

Finding: This service is feasible to initiate within the coming fiscal year. It can be found reasonable to provide transit service to this area based upon this paragraph.

p. **Definition:** Paragraph 4 of the Reasonable to Meet definition says the fact that an identified transit need cannot be fully met based upon available resources shall not be the sole reason for a finding that a transit need is not reasonable to meet.

Finding: This is understood. This analysis proposes that the requested transit service can be funded with available resources.

q. **Definition:** Paragraph 5 of the Reasonable to Meet definition says the determination of whether an unmet transit need is reasonable to meet shall not be made by comparing unmet transit needs with the need for streets and roads.

Finding: This is understood. This analysis contains no reference to streets and roads.

Based on the above evaluation, staff recommends that the Policy Board find that the proposed fixed route service to Empire until midnight, Monday through Friday, and five trips on Saturday and Sunday, is not reasonable to meet.

Stanislaus Regional Transit

4. *Establish transit between the Modesto Airport, Yosemite Blvd., and Finch Road, with hours of operation from 5:00 a.m. to midnight.*

FIND: This is an Unmet Transit Need which is Not Reasonable to Meet.

Responsible Jurisdictions: Stanislaus County and Modesto.

Discussion:

Note, there is general public dial-a-ride service to this area on Central Dial-A-Ride, Monday through Friday, from 8:00 a.m. to 6:00 p.m. Residents of the area surrounded by the San Joaquin River, the Merced County Line, Hickman Road, the Oakdale-Waterford Highway (including all of Waterford), the Riverbank-Oakdale Transit Authority boundary, and the Stanislaus River may ride to anywhere in the proposed area at any of those times. In addition, Modesto Dial-A-Ride serves the western part of this area, all of the area west of Garner Road, with ADA service from 6:00 a.m. to 6:00 p.m. (note, most of the clients of the ARC of Stanislaus, which recommended this unmet transit need, are qualified to ride Modesto Dial-A-Ride), and with general public service until 11:00 p.m. (note, however, that the service to the westerly portion of the industrial park during those late evening hours is only for Modesto area residents; for residents of Ceres or Turlock to get to this area would require transit arrangements from those areas, which the ARC of Stanislaus has requested). The portion of the industrial park east of Garner Road is not served after 6:00 p.m., and none of the area is served with fixed route transit. It can be noted that this area is surrounded on the north and east by unincorporated Stanislaus County area which is served until 11:00 p.m., Monday through Friday by Modesto Dial-A-Ride. It can be argued that a large percentage of the ARC of Stanislaus clients who would work in this area come from Modesto, so staff is analyzing this proposal from both the perspectives of Stanislaus Regional Transit and Modesto Dial-A-Ride. It is also important to note that the Regional Transportation Plan allows for a variance of up to 15 minutes from the requested pick-up time. This probably functionally eliminates a demand responsive system from usefulness as a tool to transport people to jobs involving shift work. The analysis will also evaluate the potential of service with a fixed route, but notes in advance the recommended finding above that MAX service after the current service hours is not reasonable to meet. In addition, it should be noted that many of the jobs in this area are seasonal, especially the food processing jobs. This makes the viability of a standard, year-round fixed route even lower.

a. **Definition:** Paragraph 1 of the Definition of Unmet Transit Needs says a proposal identified through the annual TDA Unmet Transit Needs hearings may be included as an Unmet Transit Need.

   Finding: This proposal was identified by the ARC of Stanislaus in the annual TDA Unmet Transit Needs public hearing.

b. **Definition:** Paragraph 2 of the Unmet Transit Needs definition says, "The transportation desires of a small group of individuals ... shall not, in and of themselves, be sufficient to justify a finding of unmet transit need."

Finding: This proposal was presented by the ARC of Stanislaus, an organization which trains many disabled individuals, most of whom are transit dependent. Staff recommends a finding that this is not "a small group of individuals", and recommends that this be found to be an unmet transit need.

c. **Definition:** Paragraph 3 of the Unmet Transit Needs definition says, "Trips which would duplicate transportation services to the general public are not considered to be unmet transit needs."

Finding: There is no general public transit service to the area east of Garner Road after 6 p.m. Based on this point, staff recommends this be found to be an unmet transit need for that limited area.

d. Paragraph 4 of the Unmet Transit Needs definition relates to proposals for future transit service, and is not applicable to this proposal.

e. Paragraph 5 of the Unmet Transit Needs definition relates to proposals for escort service, and is not applicable to this proposal.

Conclusion: Based on the above points, staff recommends the Policy Board find that this proposal is an Unmet Transit Need for the area east of Garner Road.

f. **Definition:** Paragraph 1.a of the Reasonable to Meet definition indicates that this proposed unmet transit need cannot be considered Reasonable to Meet if MAX, as a system, is currently operating at below a 20% fare revenue ratio and is currently carrying fewer than 21 passengers per vehicle service hour.

Finding: The 1995-96 City of Modesto report for MAX indicates that MAX had a 25% fare revenue ratio and carried an average of 28.81 passengers per vehicle service hour during that fiscal year. The proposal can be considered reasonable to meet based upon this paragraph.

g. **Definition:** Paragraph 1.b of the Reasonable to Meet definition indicates that this cannot be considered Reasonable to Meet if, 1) Stanislaus Regional Transit, or 2) Modesto Dial-A-Ride, as systems, are currently operating at below the fare revenue ratio and passenger productivity standards established in the Regional Transportation Plan, or as established by statute.

Finding 1: The 1995-96 Stanislaus Regional Transit report indicates that that service had an 11.7% fare revenue ratio during the 1995-96 fiscal year. The Regional Transportation Plan requires Stanislaus Regional Transit to operate at or above a 10% fare revenue ratio. The Regional Transportation Plan no longer includes a minimum passenger per vehicle service hour standard, and there is no statutory minimum. It can be considered reasonable for Stanislaus Regional Transit to provide general public demand responsive service to this area from 6:00 p.m. to 11:00 p.m. based upon this paragraph.

Finding 2: The 1995-96 Modesto Dial-A-Ride report indicates that the service had a 10.4% fare revenue ratio during that year. The Regional Transportation Plan requires Modesto Dial-A-Ride to operate at or above a 10% fare revenue ratio. The Regional Transportation Plan no longer includes a minimum passenger per vehicle service hour standard, and there is no statutory minimum. It can be considered reasonable for Modesto Dial-A-Ride to provide general public demand responsive service to this area from 6:00 p.m. to 11:00 p.m. based upon this paragraph.

h. Paragraph 1.c of the Reasonable to Meet definition establishes two requirements for this proposal:

1. **Definition:** "An extension of service shall not cause the system ... to fail to meet the systemwide performance standards."

Finding 1: The Regional Transportation Plan indicates that Stanislaus Regional Transit shall maintain a minimum fare revenue ratio of 10%, and should attempt to maintain Cost-per-Passenger, Cost-per-Hour, Cost-per-Mile, Passenger-per-Mile and Hours-per-Employee performance ratios which are more efficient than the average for comparable systems statewide, as indicated in the annual Transit Productivity Analysis. As indicated above, the 1995-96 fare revenue ratio for Stanislaus Regional Transit was 11.7%. The expansion of Central Dial-A-Ride to provide service to this area during these additional hours would cost approximately $102,128, based upon the 1995-96 operating-cost-per-hour for Stanislaus Regional Dial-A-Ride. Based upon 1995-96 statistics for Stanislaus Regional Transit, this would result in a systemwide operating cost of $1,096,547. In 1995-96 Stanislaus Regional Transit received about $116,347 in fares. If, assuming a worst case scenario, no passengers were to ride this new service for an entire year, Stanislaus Regional Transit would still maintain a 10.6% fare revenue ratio. The second half of the criteria is difficult to analyze, as the Regional transit system is both a fixed route and demand responsive service, which are measured against different standards in the Transit Productivity Analysis. However, based upon the systemwide fare revenue ratios, it can be found reasonable to provide transit service to this area.

Finding 2: The Regional Transportation Plan indicates that Modesto Dial-A-Ride shall maintain a minimum fare revenue ratio of 10%, and should attempt to maintain Cost-per-Passenger, Cost-per-Hour, Cost-per-Mile, Passenger-per-Mile and Hours-per-Employee performance ratios which are more efficient than the average for comparable systems statewide, as indicated in the annual Transit Productivity Analysis. As indicated above, the 1995-96 fare revenue ratio for Modesto Dial-A-Ride was 10.4%. The expansion of Modesto Dial-A-Ride to provide service to this area during these hours would not automatically cost the City of Modesto anything. The potential for impact to the Modesto Dial-A-Ride is only present if there are passengers riding to this new territory. A worst case scenario for Modesto Dial-A-Ride would be passengers scheduling trips to and/or from this new territory at a frequency which did not permit the scheduling of more than one passenger per one-hour-trip, and having to introduce a new vehicle into service as a result. This would generate about $5,216 in fares, but cost about $148,866, based upon the 1995-96 Modesto Dial-A-Ride cost-per-vehicle-service-hour statistics. In 1995-96, Modesto Dial-A-Ride had an operating cost of $1,135,704. In 1995-96 Modesto Dial-A-Ride received $118,455 in fares. If, assuming the above worst case scenario, Modesto Dial-A-Ride would drop to a 9.63% fare revenue ratio. It should be noted, however, that such a scenario would not occur unless and until the current fleet of vehicles first reached the limit of potential passengers-per-vehicle-service-hour, and a new vehicle had to begin operations. In 1993-94 Modesto Dial-A-Ride carried an average of 3.62 passengers-per-vehicle-service-hour, i.e., 0.65 passengers-per-vehicle-service-hour more than was carried in 1995-96. That means there is a potential to carry at least 21.9% additional passengers before there would be an absolute requirement to introduce a new vehicle. Staff sees no statistical evidence that the proposed geographic expansion of Modesto Dial-A-Ride's service boundary would result in such an expansion of ridership. According to the second half of the criteria, Modesto Dial-A-Ride should have operating-cost-per-passenger, operating-cost-per-hour, operating-cost-per-mile, passenger-per-mile, and hour-per-employee statistics which are more efficient than the mean of comparable systems. Modesto Dial-A-Ride cost $11.35 per passenger in 1995-96, and the 1994-95 mean was $12.56. Modesto Dial-A-Ride cost $33.68 per hour in 1995-96, and the 1994-95 mean was $32.50. Modesto Dial-A-Ride cost $2.25 per mile in 1995-96, and the mean was $2.22 in 1994-95. Modesto Dial-A-Ride carried 0.20 passengers per mile in 1995-96, and the 1994-95 mean was 0.19. Modesto Dial-A-Ride employees worked 1405 hours per year in 1995-96, and the mean was 1171. Staff notes that the only statistics where the 1995-96 Modesto performances were less efficient than the 1994-95 averages were the cost-per-hour and cost-per-mile. In both cases, Modesto's 1994-95 statistics were significantly more efficient than the mean. Staff recommends a finding, based on the combined 1994-95 and 1995-96 statistics, that this proposal would be reasonable for Modesto to meet.

Finding 3: The Regional Transportation Plan indicates that MAX shall maintain a minimum fare revenue ratio of 20%, and should attempt to maintain Cost-per-Passenger, Cost-per-Hour, Cost-per-Mile, Passenger-per-Mile and Hours-per-Employee performance ratios which are more efficient than the average for comparable

systems statewide, as indicated in the annual Transit Productivity Analysis. As indicated above, the 1995-96 fare revenue ratio for MAX was 25%. Establishing a MAX route to this area, six days per week, from 6:00 a.m. to 11:00 p.m., with a one hour headway, would cost about $263,556, based upon the 1995-96 MAX operating cost of $49.69. Based upon the 1995-96 operating costs for MAX, the addition of this service would result in a systemwide operating cost of $4,865,788. It is mathematically impossible for this proposed expansion, by itself, even if there were no riders, to cause MAX to drop to below a 20% fare revenue ratio, when this service is simply added to the performance of 1995-96. To avoid a duplication of the analysis of MAX found under proposal 1), above, staff simply notes that MAX already operates at a passenger per mile ratio which is significantly lower than the mean for comparable systems in the State. Based upon this, staff recommends a finding that this proposal is not reasonable for MAX to meet.

2. **Definition** "Considered separately, it shall achieve at least half the systemwide performance standards, except in the case of an extension of service determined to be a necessary lifeline service for transit dependent populations." This would require this proposal, by itself, to achieve at least a 5% fare revenue ratio (for either Dial-A-Ride) or a 10% fare revenue ratio (for MAX), cost no more than $20.74 per passenger (County), $25.12 per passenger (Modesto), or $4.10 per passenger (MAX), cost no more than $63.94 per hour (County), $65.00 per hour (Modesto) or $114.46 per hour (MAX), cost no more than $4.94 per mile (County), $4.44 per mile (Modesto) or $8.20 per mile (MAX), and carry at least 0.16 passengers per vehicle-mile (1 passenger every 6.25 miles)(County), 0.09 passengers per vehicle-mile (1 passenger every 10.6 miles) (Modesto) or 1.13 passengers per vehicle mile (MAX). These standards can be waived by the Policy Board if it determines that this service is a necessary lifeline service for a transit dependent population. This means that transit operations where the proposed territory is either a beginning or end point must meet these standards.

Finding 1: For Stanislaus Regional Transit, this new service would be an expansion of Central Dial-A-Ride. Central Dial-A-Ride had a fare revenue ratio of 7.46% for 1995-96. Because the system operated at such a low efficiency level during the good hours of the day, it is easy to imagine an extended service from 6:00 p.m. to midnight having a fare revenue ratio of below 5% for the year. Central Dial-A-Ride already cost $29.68 per passenger in 1995-96, well above the standard. Moreover, Central Dial-A-Ride carried 0.08 passengers-per-vehicle-mile in 1995-96, again well below the standard. Staff recommends a finding that this proposal is not reasonable for Stanislaus Regional Transit to meet.

Finding 2: Modesto Dial-A-Ride met all of these standards as a system in 1995-96. The simple expansion of the service area boundary does not result in any operations which would generate fares. Without an estimate of the number of trips, their average distances, and the average time each would require, it is difficult to estimate what the fare revenue ratio would be in this new service area. There is almost no population in this area to generate passengers, but there are several industrial facilities which could attract employees. The operation to and from this service area by Modesto Dial-A-Ride would not significantly impact the operating cost per passenger, per hour or per mile (some passengers would be transported further to reach this area, but that impact could not be mathematically sufficient to cause this to be unreasonable to meet on those grounds). It is mathematically and geographically possible that the operation of this new service by itself would result in an average of fewer that 0.09 passengers per vehicle-mile, i.e., each trip averaging more than 10.61 miles, but that distance appears statistically unlikely. Without data indicating that average trip distances would be that long, there is no reason to believe the fare revenue ratio for this new service would be lower than 5%. Based upon this information staff recommends a finding that this service can be reasonable for Modesto Dial-A-Ride.

Finding 3: For MAX to maintain a fare revenue ratio of 10% for this new service would require 61,292 passengers per year, or 11.56 passengers per vehicle service hour, based on a cost for the proposed service of $263,556, and the 1995-96 average fare of $0.43. For the operating cost per passenger to be less than $4.10 would require 64,282 passengers, or 12.12 passengers per vehicle service hour. The operating cost per hour and per mile are not directly related to the number of passengers carried. To carry over 1.13 passengers

per vehicle service mile would require about 20.34 passengers per vehicle service hour, based on a proposed 18 mile route serving the Beard Industrial Tract on an hourly basis, beginning and ending at the Downtown Transportation Center. In the past, MAX operated a route to this area, and it was very unproductive. Staff recommends that it is unlikely that the proposed route would carry 20.34 passengers per hour for all of the proposed operating hours, as would be necessary to satisfy this definition point. Staff recommends a finding that it would not be reasonable for MAX to meet this need.

i. **Definition:** Paragraph 1.d of the Reasonable to Meet definition indicates that the unmet transit need will not require the expenditure of more than the affected jurisdiction's proportional share of Transportation Development Act funds that are apportioned by SAAG on the basis of population.

Finding: None of the three potential options to meet the unmet transit need would cause the expenditure of more than the jurisdiction's proportional share of TDA funds. Based on this definition point, any of the three proposals can be found reasonable to meet.

j. **Definition:** Paragraph 2.a of the Reasonable to Meet definition says the determination of whether a transit need is reasonable to meet shall also take into account as appropriate the likely demand for service based on transit use rates per capita in comparable communities.

Finding 1: Modesto Dial-A-Ride already operates later than most similar operations in cities of this size. For example, the systems in Bakersfield and Stockton operate to 7:00 p.m., and in Fresno the system operates to 7:30 p.m. In addition, the systems in Stockton and Fresno do not operate more than ½ mile beyond the fixed route services . Based on this, staff recommends a finding that it is not reasonable for Modesto Dial-A-Ride to meet this need.

Finding 2: Staff has not been able to locate any county dial-a-ride services which operate in the evening, as is being requested. Based on this, staff recommends a finding that it is not reasonable for Central Dial-A-ride to meet this need.

Finding 3: Staff has surveyed the transit operations in Bakersfield, Fresno, and Stockton to determine whether they operate routes exclusively to industrial parks. Fresno has one route which operates partially through an industrial park. Bakersfield and Stockton have no such routes. Based on this data, staff recommends a finding that it is not reasonable for MAX to meet this need.

k. **Definition:** Paragraph 2.b of the Reasonable to Meet definition says the determination of whether a transit need is reasonable to meet shall also take into account as appropriate whether a service to meet the need would put the system of which it is a part in jeopardy of losing state or federal funding as a result of failing to meet mandated performance or efficiency standards.

Finding: This proposal, by itself, would not cause any of the three options to drop below their required fare revenue ratios. Staff recommends a finding that this proposal is reasonable for any of the three providers to meet based on this definition point.

l. **Definition:** Paragraph 2.c of the Reasonable to Meet definition says the determination of whether a transit need is reasonable to meet shall also take into account as appropriate the potential Americans with Disabilities Act implications within that service area, including whether or not complementary paratransit services, if required, would impose an "undue financial burden" on the public entity.

Finding: The Americans with Disabilities Act would not financially impact either Modesto Dial-A-Ride or Central Dial-A-Ride if they provided this service. If MAX were to provide this service it would be necessary for Modesto Dial-A-Ride to operate as the Americans with Disabilities Act provider for the area not already served by Modesto Dial-A-Ride. Staff suggests that the expansion of Modesto Dial-A-Ride's service boundary east to the Santa Fe railroad tracks would not be an undue financial burden, in itself, and for that reason recommends a finding that this proposal is reasonable for any of the three operators to meet based on this definition point.

m. Paragraph 2.d of the Reasonable to Meet definition is not applicable.

n. **Definition:** Paragraph 2.e of the Reasonable to Meet definition says the determination of whether a transit need is reasonable to meet shall also take into account as appropriate opportunities for coordination among adjoining entities or with private transportation providers and/or funding agencies. This shall include consideration of other existing resources (including financial), as well as the legal or customary responsibilities of the other entities (e.g., social service agencies, religious organizations, schools, carpools, etc.). Duplication of other services or resources is unnecessary and not a prudent use of public funds.

Finding: There is opportunity for coordination with the three existing taxi services which serve the area. Other existing resources which serve the area include the Empire School District, which provides school busing for the elementary students, and the Valley Mountain Regional Center, which contracts for transportation for its clients. Staff has no knowledge of how those vehicles could be used to offset the fixed route transit service which has been requested by the ARC of Stanislaus, but encourages a documentation of the use of those vehicles prior to further requests for use of public vehicles to operate on this route. Staff has no documentation of carpools which are operating in the area and available to transport transit dependent persons to Modesto. Staff also has no documentation of religious organizations offering that service. It can be found reasonable to provide transit service to this area based upon this paragraph.

o. **Definition:** Paragraph 3 of the Reasonable to Meet definition says an unmet transit need may be determined to be unreasonable to meet because it is not feasible to initiate service within the coming fiscal year, due to the time required for vehicle acquisition, planning, or similar timing factors, or because additional information is needed to determine whether or not the unmet transit need is reasonable to meet. An unmet transit need shall not be determined unreasonable to meet more than once on these grounds.

Finding: This service is feasible to initiate within the coming fiscal year. It can be found reasonable to provide transit service to this area based upon this paragraph.

p. **Definition:** Paragraph 4 of the Reasonable to Meet definition says the fact that an identified transit need cannot be fully met based upon available resources shall not be the sole reason for a finding that a transit need is not reasonable to meet.

Finding: This is understood. This analysis proposes that the requested transit service can be funded with available resources. It can be found reasonable to provide transit service to this area based upon this paragraph.

q. **Definition:** Paragraph 5 of the Reasonable to Meet definition says the determination of whether an unmet transit need is reasonable to meet shall not be made by comparing unmet transit needs with the need for streets and roads.

Finding: This is understood. This analysis contains no reference to streets and roads.

Based upon the above analysis, staff recommends a finding that it is not reasonable for, 1) Modesto Dial-A-Ride, 2) Central Dial-A-Ride , or 3) MAX to meet this need.

Stanislaus Regional Transit

5. *Provide service to the East Oakdale area, east to Orange Blossom Road.*

Affected Jurisdictions: Stanislaus County directly, and the cities of Oakdale and Riverbank indirectly.

Find: This is an Unmet Transit Need which is Reasonable to Meet.

Note, though the entire area is in the unincorporated County, the requests have been for the Riverbank-Oakdale Transit Authority (ROTA) to provide the service. The following analysis looks at both the County and ROTA as potential service providers for this area. Note also, this proposal was further analyzed at the request of the Technical Advisory Committee, based upon questions from Stanislaus Regional Transit. That analysis is attached as Appendix J. In addition, at the request of the Policy Board, a map of the proposed service area was prepared for the Board's July 9 meeting, which is attached as Appendix K. That map also identifies an additional area needing transit service, as stated in the Policy Board motion. Comments received at the June 11 public hearing regarding this proposal are attached as Appendices L and M.

a. **Definition:** Paragraph 1 of the Definition of Unmet Transit Needs says a proposal identified through the annual TDA Unmet Transit Needs hearings may be included as an Unmet Transit Need.

   Finding: This proposal was identified at the annual TDA Unmet Transit Needs public hearing.

b. **Definition:** Paragraph 2 of the Unmet Transit Needs definition says, "The transportation desires of a small group of individuals ... shall not, in and of themselves, be sufficient to justify a finding of unmet transit need."

   Finding: This proposal was presented by the Social Services Transportation Advisory Council, and by a resident of the "East Oakdale" neighborhood, who brought a petition which included 419 signatures; in addition staff has received ten letters in favor of this proposal, and therefore this can qualify under this point. The petition and all of the letters are included as appendices to this report.

c. **Definition:** Paragraph 3 of the Unmet Transit Needs definition says, "Trips which would duplicate transportation services to the general public are not considered to be unmet transit needs."

   Finding: This area is not served by any public transit service. Therefore this proposal is consistent with this definition.

d. Paragraph 4 of the Unmet Transit Needs definition relates to proposals for future transit service, and is not applicable to this proposal.

e. Paragraph 5 of the Unmet Transit Needs definition relates to proposals for escort service, and is not applicable to this proposal.

Conclusion: Staff recommends that this proposal be found to be an Unmet Transit Need.

f. Paragraph 1.a of the Reasonable to Meet definition does not apply to this proposal.

g. **Definition:** Paragraph 1.b of the Reasonable to Meet definition indicates that this cannot be considered Reasonable to Meet if Stanislaus Regional Transit, as a system, is currently operating at below the fare revenue ratio and passenger productivity standards established in the Regional Transportation Plan, or as established by statute.

Finding 1: The 1995-96 report for Stanislaus Regional Transit indicates that that service had an 11.7% fare revenue ratio during the 1995-96 fiscal year. The Regional Transportation Plan requires Stanislaus Regional Transit to operate at or above a 10% fare revenue ratio. The Regional Transportation Plan no longer includes a minimum passenger per vehicle service hour standard, and there is no statutory minimum. It can be found reasonable for Stanislaus Regional Transit to provide transit service to this area based upon this paragraph.

Finding 2: The 1995-96 report for ROTA indicates that that service had an 8% fare revenue ratio for that fiscal year. The Regional Transportation Plan says "new systems should meet the above performance standards after the second full fiscal year of operation". That statement is referencing the standard that ROTA maintain a minimum 10% fare revenue ratio. ROTA is a new system, and thus is not in violation of TDA or Regional Transportation Plan standards by operating at below a 10% fare revenue ratio during the 1995-96 fiscal year, but staff recommends that it is not the intent of the definition to allow a finding that it is reasonable for a transit operation to meet a need when it had a lower than 10% fare revenue ratio, simply because it is a new operation. Based upon this, staff recommends a finding that it is not reasonable for ROTA to meet this need.

h. Paragraph 1.c of the Reasonable to Meet definition establishes two requirements for this proposal:

1. **Definition:** "An extension of service shall not cause the system ... to fail to meet the systemwide performance standards."

   Finding 1: The Regional Transportation Plan indicates that Stanislaus Regional Transit must maintain a minimum fare revenue ratio of 10%, and should attempt to maintain Cost-per-Passenger, Cost-per-Hour, Cost-per-Mile, Passenger-per-Mile and Hours-per-Employee performance ratios which are more efficient than the average for comparable systems statewide, as indicated in the annual Transit Productivity Analysis. As noted above, Stanislaus Regional Transit currently operates at above the required 10% fare revenue ratio minimum. If Stanislaus Regional Transit contracted with its current contractor to have one vehicle available, Monday through Friday, from 9:00 a.m. to 5:00 p.m., this would cost about $354 per day, $1,768 per week, and about $91,915 per year. Based upon 1995-96 statistics for Stanislaus Regional Transit, this would result in a systemwide operating cost of $1,086,334. In 1995-96 Stanislaus Regional Transit received about $116,347 in fares. If, assuming a worst case scenario, no passengers were to ride this new service for an entire year, Stanislaus Regional Transit would still maintain a 10.7% fare revenue ratio. The second half of the criteria is difficult to analyze, as the County transit system is both a fixed route and demand responsive service, which are measured against different standards in the Transit Productivity Analysis. However, based upon the systemwide fare revenue ratios, it can be found reasonable for Stanislaus Regional Transit to provide transit service to this area.

   Finding 2: As noted above, ROTA had a fare revenue ratio of 8% in 1995-96. In order for this expansion not to cause ROTA to perform at less than a 10% fare revenue ratio, the operation in this new area would have to be significantly greater than that in the remainder of the ROTA service area, i.e., it would have to raise the fare revenue ratio of the entire system. Staff recommends that it is not reasonable for ROTA to meet this need.

2. **Definition** "Considered separately, it shall achieve at least half the systemwide performance standards, except in the case of an extension of service determined to be a necessary lifeline service for transit dependent populations." This would require this proposal, by itself, to achieve at least a 5% fare revenue ratio, cost no more than $20.74 per passenger, cost no more than $63.94 per hour, cost no more than $4.94 per mile, and carry at least 0.16 passengers per vehicle-mile (1 passenger every 6.25 miles). These standards can be waived by the Policy Board if it determines that this service is a necessary lifeline service for a transit dependent population.

Finding 1: For this service to operate at a 5% fare revenue ratio would require annual fares of approximately $4,596 to be generated by the riders during the first year of operation. With an average fare rate of $0.83, as was collected in 1995-96 on the West Side Dial-A-Ride (the most similar local system), this would require about 5,537 passengers during the first year of operation, or just under 2.4 passengers per hour. If the proposed service cost $91,915 per year, it would require about 4,432 passengers per year to exceed the cost per passenger standard. The proposed service cost is less than the $149,620 which $63.94 per hour would allow. The proposed cost per mile standard is $4.94, whereas Stanislaus County Dial-A-Ride only cost $2.17 per mile in 1995-96. In order for the proposed system to carry fewer than 0.16 passengers per mile, the average trip per passenger would have to be greater than 6.25 miles. Because the proposal is for service to be extended to the Orange Blossom Bridge, which is approximately four miles east of the city limits of Oakdale (only 3.5 miles east of the ROTA service boundary), it would only be possible to exceed 6.25 miles per passenger if, 1) the vehicle were parked in Oakdale, and 2) the average passenger lived more than 3.125 east of Oakdale. Because only a small percentage of the population of this area lives that far east of Oakdale, it is very likely that this standard would be met. It can be found reasonable for Stanislaus Regional Transit to provide transit service to this area based upon this paragraph.

Finding 2: For ROTA this would require a 5% fare revenue ratio, not more than $14.28 per passenger, not more than $63.98 per hour, not more than $6.10, and a minimum of 0.23 passengers per mile (i.e., one passenger every 4.35 miles). If ROTA were to dedicate one vehicle to this service, this would be 3,874 hours of service. At $45.29 per hour (ROTA's 1995-96 hourly rate) this would cost $175,453. The average fare per passenger in 1995-96 was $1.09. At that rate, it would 8,048 passengers (note, staff proposes the same hours of operation for the new ROTA service area as the current service area). This would require 2.08 passengers per vehicle service hour. To operate at below $14.28 in this new area would require 12,287 passengers per year, or 3.17 passengers per vehicle service hour. The proposal would not directly impact the cost per hour or cost per mile. It is important to note that ROTA operated at below the minimum passengers per mile as a system in 1995-96. Based on this definition point, staff recommends a finding that it is not reasonable for ROTA to meet this need.

i. **Definition:** Paragraph 1.d of the Reasonable to Meet definition indicates that the unmet transit need will not require the expenditure of more than the affected jurisdiction's proportional share of Transportation Development Act funds that are apportioned by SAAG on the basis of population.

Finding1: Stanislaus County currently is allocated $2,304,460 of Transportation Development Act "Local Transportation Funds". These funds are allocated to fund transit needs in Stanislaus County, and additional projects as allowed in the Transportation Development Act. Approximately $650,000 of Stanislaus County Local Transportation Funds were spent in 1995-96 on the operation of Stanislaus Regional Transit. The proposed service is expected to cost approximately $92,000 per year. It can be found reasonable for Stanislaus Regional Transit to provide transit service to this area based upon this paragraph.

Finding 2: Because this service is in unincorporated Stanislaus County, there would not be any Riverbank or Oakdale "Local Transportation Funds" spent to meet this need. It can be found reasonable for ROTA to meet this need based on this definition point.

j. **Definition:** Paragraph 2.a of the Reasonable to Meet definition says the determination of whether a transit need is reasonable to meet shall also take into account as appropriate the likely demand for service based on transit use rates per capita in comparable communities.

Finding: The two most comparable communities to East Oakdale in Stanislaus County are Del Rio and North Oaks. Those communities are both higher income neighborhoods, separated from any city, and are both served by rural dial-a-ride service. Del Rio has about 750 people and North Oaks has about 400 people. In the 1995-96 Unmet Transit

Needs analysis this proposal was evaluated in comparison with the demand for service in these neighborhoods. At that time the demand was estimated to be inadequate to make this need reasonable to meet. That year there was only one request for transportation. The systematic petition and letters expressing a desire and need for transit service in this neighborhood argue that it is not appropriate to compare the current low ridership in those other two neighborhoods with the likely demand in the East Oakdale neighborhood. Based upon this year's information, staff recommends it be found reasonable for either Stanislaus Regional Transit or ROTA to provide transit service to this area based upon this paragraph.

k. **Definition:** Paragraph 2.b of the Reasonable to Meet definition says the determination of whether a transit need is reasonable to meet shall also take into account as appropriate whether a service to meet the need would put the system of which it is a part in jeopardy of losing state or federal funding as a result of failing to meet mandated performance or efficiency standards.

Finding 1: As indicated in the above analyses of efficiency, it is not expected that this service would cause Stanislaus Regional Transit to violate any mandated state performance or efficiency standards. Staff is not aware of any federal standards which the County must meet. It can be found reasonable for Stanislaus Regional Transit to provide transit service to this area based upon this paragraph.

Finding 2: As noted above, ROTA operated at below a 10% fare revenue ratio during the 1995-96 fiscal year. It is very possible that this operation could cause ROTA to stay below a 10% fare revenue ratio into its third fiscal year of operation. Based on this point, staff recommends a finding that it is not reasonable for ROTA to meet this need.

l. **Definition:** Paragraph 2.c of the Reasonable to Meet definition says the determination of whether a transit need is reasonable to meet shall also take into account as appropriate the potential Americans with Disabilities Act implications within that service area, including whether or not complementary paratransit services, if required, would impose an "undue financial burden" on the public entity.

Finding: Because the proposed service would be a demand responsive service, no complementary paratransit service will be required. It can be found reasonable for either Stanislaus Regional Transit or ROTA to provide transit service to this area based upon this paragraph.

m. Paragraph 2.d of the Reasonable to Meet definition is not applicable.

n. **Definition:** Paragraph 2.e of the Reasonable to Meet definition says the determination of whether a transit need is reasonable to meet shall also take into account as appropriate opportunities for coordination among adjoining entities or with private transportation providers and/or funding agencies. This shall include consideration of other existing resources (including financial), as well as the legal or customary responsibilities of the other entities (e.g., social service agencies, religious organizations, schools, carpools, etc.). Duplication of other services or resources is unnecessary and not a prudent use of public funds.

Finding: There are opportunities for coordination with the following adjoining public and/or private transportation providers; 1) Oakdale Taxi Company, and 2) Superior Cab. Other existing resources which serve the area include the Oakdale School District, which provides school busing for the students, and the Valley Mountain Regional Center, which contracts for transportation for its clients. Staff has no documentation of carpools which are operating in the area and available to transport transit dependent persons to Oakdale. Staff also has no documentation of religious organizations offering that service. It can be found reasonable for either Stanislaus Regional Transit or ROTA to provide transit service to this area based upon this paragraph.

o. **Definition:** Paragraph 3 of the Reasonable to Meet definition says an unmet transit need may be determined to be unreasonable to meet because it is not feasible to initiate service within the coming fiscal year, due to the time

required for vehicle acquisition, planning, or similar timing factors, or because additional information is needed to determine whether or not the unmet transit need is reasonable to meet. An unmet transit need shall not be determined unreasonable to meet more than once on these grounds.

Finding: This service is feasible to initiate by either Stanislaus Regional Transit or ROTA within the coming fiscal year. It can be found reasonable for either transit operator to provide transit service to this area based upon this paragraph.

p. **Definition:** Paragraph 4 of the Reasonable to Meet definition says the fact that an identified transit need cannot be fully met based upon available resources shall not be the sole reason for a finding that a transit need is not reasonable to meet.

Finding: This is understood. This analysis proposes that the requested transit service can be funded with available resources by either Stanislaus County Transit or ROTA. It can be found reasonable for either transit operator to provide transit service to this area based upon this paragraph.

q. **Definition:** Paragraph 5 of the Reasonable to Meet definition says the determination of whether an unmet transit need is reasonable to meet shall not be made by comparing unmet transit needs with the need for streets and roads.

Finding: This is understood. This analysis contains no reference to streets and roads.

Based upon the above analysis, staff recommends the following two findings:

1) Based upon the several recommended findings that it would not be reasonable for ROTA to met this need, staff recommends a finding that it would not be reasonable for ROTA to meet this need.
2) Based upon the above analysis, containing no recommended finding that the proposed service to the East Oakdale area is not reasonable for the Stanislaus Regional Transit to meet, staff recommends a finding that it is reasonable for the Stanislaus Regional Transit to meet this transit need.

Stanislaus Regional Transit

6. *Provide service ½ mile north of Rodden Road along 28 Mile Road.* (The letter requesting this service is included as Appendix D .)

Affected Jurisdictions: Stanislaus County directly, and the cities of Oakdale and Riverbank indirectly.

Find: This is not an Unmet Transit Need.

a. **Definition:** Paragraph 1 of the Definition of Unmet Transit Needs says a proposal identified through the annual TDA Unmet Transit Needs hearings may be included as an Unmet Transit Need.

Finding: Staff received a letter requesting that this service be recommended as an unmet transit need at the Policy Board public hearing. Though staff failed to read the letter into the record, staff recommends this be viewed as an unmet transit need based on this point.

b. **Definition:** Paragraph 2 of the Unmet Transit Needs definition says, "SAAG recognizes that public transportation includes a broad range of users, uses, and destinations. Although some services may be restricted or give priority to traditionally transit-dependent populations (such as elderly, youths, disabled, or low-income persons), all eligible users should have equivalent access or opportunity to use the service. The transportation desires of a small group of indivi-

duals or of the clients of particular agencies shall not, in and of themselves, be sufficient to justify a finding of unmet transit need."

Finding: This proposal is a request by one individual for transit service for her wheelchair bound husband to the doctor in Oakdale. Currently, the ROTA service boundary extends north to the residences on the north side of Rodden Road. There are six ranchette parcels separating the ROTA service area from the 103 acre ranch of the person making the request. In light of the reference to a small group, in and of itself, not qualifying as an unmet transit need, staff is prepared to recommend that this request is not an unmet transit need. (Staff has communicated to Ms. Harbour about private transportation services which specialize in transporting wheelchair bound individuals. Staff hopes that a workable solution to that family's dilemma develops soon.)

c. **Definition:** Paragraph 3 of the Unmet Transit Needs definition says, "Trips which would duplicate transportation services to the general public are not considered to be unmet transit needs."

Finding: This area is not served by any public transit service. This proposal can be found to be an unmet transit need based upon this definition.

d. Paragraph 4 of the Unmet Transit Needs definition relates to proposals for future transit service, and is not applicable to this proposal.

e. Paragraph 5 of the Unmet Transit Needs definition relates to proposals for escort service, and is not applicable to this proposal.

Staff recommends that this proposal not be found to be an Unmet Transit Need.

Riverbank-Oakdale Transit Authority

7. *People who live in the ROTA service area should be provided transit directly to other areas in the County which were served by Central Dial-A-Ride, as they were before the creation of ROTA.*

FIND: This is not an unmet transit need.

Affected Jurisdictions: Oakdale and Riverbank directly, Stanislaus County, Ceres, Hughson, Modesto, Turlock, and Waterford indirectly.

Discussion:

a. **Definition:** Paragraph 1 of the Definition of Unmet Transit Needs says a proposal identified through the annual TDA Unmet Transit Needs hearings may be included as an Unmet Transit Need.

Finding: This proposal was identified by the Social Services Transportation Advisory Council in the annual TDA Unmet Transit Needs public hearing.

b. **Definition:** Paragraph 2 of the Unmet Transit Needs definition says, "SAAG recognizes that public transportation includes a broad range of users, uses, and destinations. Although some services may be restricted or give priority to traditionally transit-dependent populations (such as elderly, youths, disabled, or low-income persons), all eligible users should have equivalent access or opportunity to use the service. The transportation desires of a small group of individuals or of the clients of particular agencies shall not, in and of themselves, be sufficient to justify a finding of unmet transit need."

Finding: The Social Services Transportation Advisory Council received this complaint from three individuals who had been provided transit into Modesto by ROTA, until ROTA changed its policy to provide this transit only to individuals with a doctor's statement that it was needed. Staff understands that the Social Services Transportation Advisory Council recommended this as an unmet transit need which is reasonable to meet based on a sense that the people in the ROTA service area had been dealt with unfairly. Staff has requested information regarding the number of passengers there were who rode Central Dial-A-Ride either into or out of the current ROTA service area prior to the creation of ROTA. The dispatchers for Central Dial-A-Ride only had record of "about five". Staff also called Ms. Rosemarie Rocha, the manager for ROTA to determine the number of individuals in the ROTA service area who request transportation to other cities which were in the Central Dial-A-Ride service area prior to the creation of ROTA. Ms. Rocha indicated she only has "about five" persons who request that service. Based upon these numbers, and noting that some of those may be the same people, staff recommends a finding that this number is not sufficient to justify a finding of an unmet transit need.

c. **Definition:** Paragraph 3 of the Unmet Transit Needs definition says, "Trips which would duplicate transportation services to the general public are not considered to be unmet transit needs."

Finding: This proposed service would not duplicate any general public transit service.

d. Paragraph 4 of the Unmet Transit Needs definition relates to proposals for future transit service, and is not applicable to this proposal.

e. Paragraph 5 of the Unmet Transit Needs definition relates to proposals for escort service, and is not applicable to this proposal.

Staff recommends this not be found to be an Unmet Transit Need.

Stanislaus Regional Transit

8. *Increase service between Modesto and Turlock and hours of operations from 5:00 a.m. to midnight.*

FIND: This is an unmet transit need which is not reasonable to meet.

Affected Jurisdictions: Stanislaus County directly, Ceres, Modesto, and Turlock indirectly.

Discussion:

a. **Definition:** Paragraph 1 of the Definition of Unmet Transit Needs says a proposal identified through the annual TDA Unmet Transit Needs hearings may be included as an Unmet Transit Need.

Finding: This proposal was identified by the ARC of Stanislaus in the annual TDA Unmet Transit Needs public hearing.

b. **Definition:** Paragraph 2 of the Unmet Transit Needs definition says, "The transportation desires of a small group of individuals ... shall not, in and of themselves, be sufficient to justify a finding of unmet transit need."

Finding: This proposal was presented by the ARC of Stanislaus, an organization which trains more than 100 disabled individuals, and works with organizations with more than 100 additional clients (please see letters from ARC of

Stanislaus in Appendix E), most of whom are transit dependent. Staff recommends a finding that this is not "a small group of individuals", and recommends that this be found to be an unmet transit need.

c. **Definition:** Paragraph 3 of the Unmet Transit Needs definition says, "Trips which would duplicate transportation services to the general public are not considered to be unmet transit needs."

Finding: This proposed service would not duplicate any general public transit service.

d. Paragraph 4 of the Unmet Transit Needs definition relates to proposals for future transit service, and is not applicable to this proposal.

e. Paragraph 5 of the Unmet Transit Needs definition relates to proposals for escort service, and is not applicable to this proposal.

Conclusion: Staff recommends this be found to be an Unmet Transit Need.

f. Paragraph 1.a of the Reasonable to Meet definition does not apply to this proposal.

g. **Definition**: Paragraph 1.b of the Reasonable to Meet definition indicates that this cannot be considered Reasonable to Meet if Stanislaus Regional Transit, as a system, is currently operating at below the fare revenue ratio and passenger productivity standards established in the Regional Transportation Plan, or as established by statute.

Finding: The Regional Transportation Plan has established the following standards for Stanislaus Regional Transit: Fare Revenue Ratio minimum of 10%. There is no passenger productivity standard adopted in the Regional Transportation Plan or by statute. In 1995-96 Stanislaus Regional Transit maintained a fare revenue ratio of 11.7%. Based on this point this proposal can be found reasonable to meet.

h. Paragraph 1.c of the Reasonable to Meet definition establishes two requirements for this proposal:

1. **Definition:** "An extension of service shall not cause the system ... to fail to meet the systemwide performance standards."

   Finding: The Regional Transportation Plan indicates that Stanislaus Regional Transit must maintain a minimum fare revenue ratio of 10%, and should attempt to maintain Cost-per-Passenger, Cost-per-Hour, Cost-per-Mile, Passenger-per-Mile and Hours-per-Employee performance ratios which are more efficient than the average for comparable systems statewide, as indicated in the annual Transit Productivity Analysis. As noted above, Stanislaus Regional Transit currently operates at above the required 10% fare revenue ratio minimum. The 1995-96 fixed route operations of Stanislaus County cost $4.47 per passenger, and $2.39 per vehicle-service-mile. The current contracted rate per hour for the fixed route vehicles is $77.91 per vehicle-service-hour. If Stanislaus Regional Transit provided late evening service from Modesto to Turlock, from its last current scheduled stop until near Midnight (note, for ease of schedule coordination, stopping at about 11:00 is more logical), Monday through Saturday, this would involve two additional round trips each day, cost about $76,975 per year. Based upon 1995-96 statistics for Stanislaus Regional Transit, this would result in a systemwide operating cost of about $1,071,400. In 1995-96 Stanislaus Regional Transit received about $116,347 in fares. If, assuming a worst case scenario, no passengers were to ride this new service for an entire year, Stanislaus Regional Transit would still maintain a 10.9% fare revenue ratio. Based upon the systemwide fare revenue ratios, it can be found reasonable to provide this transit service.

2. **Definition** "Considered separately, it shall achieve at least half the systemwide performance standards, except in the case of an extension of service determined to be a necessary lifeline service for transit dependent

populations." This would require this proposed extension, by itself, to achieve at least a 5% fare revenue ratio, cost no more than $9.86 per passenger, cost no more than $95.22 per hour, cost no more than $4.12 per mile, and carry at least 0.22 passengers per vehicle-mile (1 passenger every 4.55 miles). These standards can be waived by the Policy Board if it determines that this service is a necessary lifeline service for a transit dependent population.

Finding: For this service to operate at a 5% fare revenue ratio would require minimum annual fares of $3,849 to be generated by the riders during the first year of operation. With an average fare rate of $0.63, as was collected in 1995-96 on Stanislaus Regional Transit fixed routes, this would require a minimum of 6,110 passengers during the first year of operation, or just under 6.2 passengers per hour. If the proposed service cost $76,975 per year, it would require 7,807 passengers during the first year not to exceed the cost-per-passenger standard. This would require 7.9 passengers-per-vehicle service-hour. Though the Modesto-Turlock route averaged about 20.5 passengers-per-vehicle-service-hour in 1995-96, it is important to note that the last runs of the day averaged fewer than five passengers-per-vehicle-service-hour; it is unlikely that operations later in the evening would carry more passengers-per-hour than the current operations. The proposed service cost is less than the $94,077 which $95.22 per hour would allow. The proposed cost per mile standard is $4.12, whereas Stanislaus County fixed routes only cost $2.39 per mile in 1995-96. In order for the proposed system to carry fewer than 0.22 passengers per mile, the average trip per passenger would have to be greater than 4.55 miles. Staff recommends that this proposal be found not reasonable to meet based upon this paragraph.

i. **Definition:** Paragraph 1.d of the Reasonable to Meet definition indicates that the unmet transit need will not require the expenditure of more than the affected jurisdiction's proportional share of Transportation Development Act funds that are apportioned by SAAG on the basis of population.

Finding: Stanislaus County currently is allocated $2,304,460 of Transportation Development Act "Local Transportation Funds". These funds are allocated to fund transit needs in Stanislaus County, and additional projects as allowed in the Transportation Development Act. Approximately $650,000 of Stanislaus County Local Transportation Funds were spent in 1995-96 on the operation of Stanislaus Regional Transit. The proposed service is expected to cost approximately $80,000 per year. It can be found reasonable to provide transit service to this area based upon this paragraph.

j. **Definition:** Paragraph 2.a of the Reasonable to Meet definition says the determination of whether a transit need is reasonable to meet shall also take into account as appropriate the likely demand for service based on transit use rates per capita in comparable communities.

Finding: Staff has reviewed the rural fixed route systems of counties throughout the State and has not identified any rural fixed route system which operates later than 9:00 p.m. Based upon these findings, staff recommends a finding that this service is not reasonable to meet.

k. **Definition:** Paragraph 2.b of the Reasonable to Meet definition says the determination of whether a transit need is reasonable to meet shall also take into account as appropriate whether a service to meet the need would put the system of which it is a part in jeopardy of losing state or federal funding as a result of failing to meet mandated performance or efficiency standards.

Finding: As indicated in the above analyses of efficiency, it is not expected that this service would cause Stanislaus Regional Transit to violate any mandated state performance or efficiency standards. Staff is not aware of any federal standards which the County must meet. It can be found reasonable to provide transit service to this area based upon this paragraph.

l. **Definition:** Paragraph 2.c of the Reasonable to Meet definition says the determination of whether a transit need is reasonable to meet shall also take into account as appropriate the potential Americans with Disabilities Act implications within that service area, including whether or not complementary paratransit services, if required, would impose an "undue financial burden" on the public entity.

Finding: The current Modesto-Turlock route is operated as a commuter route, and therefore is exempt from ADA requirements for complementary paratransit service. It can be found reasonable to provide transit service to this area based upon this paragraph.

m. Paragraph 2.d of the Reasonable to Meet definition is not applicable.

n. **Definition:** Paragraph 2.e of the Reasonable to Meet definition says the determination of whether a transit need is reasonable to meet shall also take into account as appropriate opportunities for coordination among adjoining entities or with private transportation providers and/or funding agencies. This shall include consideration of other existing resources (including financial), as well as the legal or customary responsibilities of the other entities (e.g., social service agencies, religious organizations, schools, carpools, etc.). Duplication of other services or resources is unnecessary and not a prudent use of public funds.

Finding: Staff is not familiar with any alternative transit services connecting Modesto and Turlock. It can be found reasonable to provide transit service to this area based upon this paragraph.

o. **Definition:** Paragraph 3 of the Reasonable to Meet definition says an unmet transit need may be determined to be unreasonable to meet because it is not feasible to initiate service within the coming fiscal year, due to the time required for vehicle acquisition, planning, or similar timing factors, or because additional information is needed to determine whether or not the unmet transit need is reasonable to meet. An unmet transit need shall not be determined unreasonable to meet more than once on these grounds.

Finding: This service is feasible to initiate within the coming fiscal year. It can be found reasonable to provide transit service to this area based upon this paragraph.

p. **Definition:** Paragraph 4 of the Reasonable to Meet definition says the fact that an identified transit need cannot be fully met based upon available resources shall not be the sole reason for a finding that a transit need is not reasonable to meet.

Finding: This is understood. This analysis proposes that the requested transit service can be funded with available resources. It can be found reasonable to provide transit service to this area based upon this paragraph.

q. **Definition:** Paragraph 5 of the Reasonable to Meet definition says the determination of whether an unmet transit need is reasonable to meet shall not be made by comparing unmet transit needs with the need for streets and roads.

Finding: This is understood. This analysis contains no reference to streets and roads. It can be found reasonable to provide transit service to this area based upon this paragraph.

Based upon the above analysis, staff recommends a finding that the proposed transit service is not reasonable to meet.

City of Modesto and Stanislaus Regional Transit

9. *Provide or arrange for direct transit connection to either the Pleasanton BART station or to the San Joaquin Regional Transit service to that BART station.*

FIND: This is not an unmet transit need.

Affected Jurisdictions: Modesto and Stanislaus County directly, Ceres, and Turlock indirectly.

Note: The Citizens Advisory Committee pointed out that the following discussion does not analyze the requested service from Turlock. Staff has written an analysis of the requested service from Turlock, which is attached as Appendix Y.

Discussion:

The City of Modesto has obtained Federal Congestion Mitigation and Air Quality funds to operate a bus from the Modesto Transit Center to either the Stockton Metro Area Regional Transit (SMART) bus to the BART station, or to the Lathrop Altamont Train station (the Altamont Train will stop near the Pleasanton BART station, and a shuttle will connect the stations), at some time during the upcoming fiscal year. Based on the current plans which indicate that this service will be in place prior to the end of the 1997-98 fiscal year, staff recommends a finding that this is not an unmet transit need.

The following transit issues were also noted at the November 7 or December 5, 1996 meeting of the Social Services Transportation Advisory Council. None of these proposals received any votes for recommendation as Unmet Transit Needs considered Reasonable to Meet by members of the Social Services Transportation Advisory Council at its February 6 meeting. Therefore, these items are mentioned for information only, and are not being evaluated as potential Unmet Transit Needs which may be Reasonable to Meet because they were not specifically recommended as such.

ROTA vans are difficult for some elderly riders to board.

ROTA should take passengers from Oakdale to the Riverbank Amtrak Station on Saturday.

Stanislaus Regional Transit's Modesto-Riverbank-Oakdale bus on Saturday to the Vintage Faire Mall should drop passengers off on the Mall grounds, rather than across from it. It is unsafe to cross Sisk Road to get to the Mall due to the high traffic volume.

Stanislaus Regional Transit should provide daily transit from Oakdale to the Vintage Faire Mall.

There should be more marketing of the existing bus service.

The Riverbank -Oakdale Transit Authority should operate in Riverbank on Saturday. It is inconsistent to desire the Amtrak station, but not provide transit to it.

There should be Sunday transit service in Empire.

An individual who lives on Heather Hills Lane, southeast of Oakdale, wishes to have transit service available to the area. Currently, this area is about four miles southeast of the Riverbank-Oakdale Transit Authority service area boundary, and about two miles east of the County's Central Dial-A-Ride service area boundary.

The Riverbank-Oakdale Transit Authority should provide service for individuals from Oakdale to Modesto regardless of trip purpose.

APPENDIX A

The following is the letter from Sandra Elespuru-Bishop, Chair of the Social Services Transportation Advisory Council to the Policy Board recommending that transit service to Orange Blossom Road and that transit service should be reestablished to areas currently within the ROTA service boundary area, both are unmet transit needs which are reasonable to meet.

SOCIAL SERVICES TRANSPORTATION ADVISORY COUNCIL

A committee of the Stanislaus Area Association of Governments

February 6, 1997

Paul Caruso
Chairman, Policy Board
Stanislaus Area Association of Governments

RE: Unmet Transit Needs

Dear Chairman Caruso and members of the Policy Board:

At its December 5, 1996 meeting, the Social Services Transportation Advisory Council (SSTAC) moved to recommend the following transit services as Unmet Transit Needs which are Reasonable to Meet, as required by the Transportation Development Act as by the bylaws of SAAG. I, as chair of Social Services Transportation Advisory Council, was requested to present these recommendations to your Board.

The recommendation are as follows:

1. The Riverbank-Oakdale Transit Authority should operate to Orange Blossom Road.

2. Those areas which had been served by Central Dial-A-Ride but are no longer being served since the establishment of the Riverbank-Oakdale Transit Authority should be served.

The Social Services Transportation Advisory Council recommends these proposals to you as both Unmet Transit Needs and as Reasonable to Meet, after reviewing the adopted SAAG definitions of an Unmet Transit Need and of what is Reasonable to Meet. SSTAC reviewed eight other suggested Unmet Transit Needs in light of the adopted definitions, and determined that they were not Unmet Transit Needs and/or Reasonable to Meet.

It is my understanding that, based upon SSTAC's recommendation, SAAG staff will be undertaking a formal analysis of these recommendations, as well as any other proposals which may emerge from the public hearing process. SSTAC reserves the right to comment further, based on the staff analysis.

Thank you for your attention to this important matter.

Sincerely,

Sandra Elespuru-Bishop
Chair, Social Services Transportation Advisory Council

APPENDIX B

The following is the petition submitted by Mr. Dennis Snell, in favor of the proposed service to the East Oakdale neighborhood. The petition is 34 pages long and contains 419 signatures.

Insights ...distinctive photography

March 18, 1997

SAAG
Modesto, California

To Whom It May Concern

This letter is a request for expansion of the ROTA service area. Because we live two streets beyond the Eastern boundary of Oakdale's service area, our legally blind daughter has no independent access to her community. I have offered to drive Cheryl to a ROTA pick-up place so that she could have transportation to shopping or a movie. Unfortunately, she is ineligible for any ROTA use due to our address. This same ineligibility exists with the taxi company.

We would like for our daughter to work — and to spend her tax dollars — in Oakdale, but it is unsuitable for her to be where she is denied transportation to a bank, hairdresser or a medical appointment.

Is it not discriminatory to deny her, and others with special needs, access to their community and/or necessary services? Please know how grateful we will be when the ROTA area has been expanded.

Respectfully,
Marilyn Niles

10331 Saint Andrews Drive · Oakdale, CA 95361 · 209-848-3663

We, the undersigned residents of Oakdale would like RoTA service extended East of Town.

NAME	Residence	phone (pg 1)	Date
R. Doug Jones	10117 Del Almendra	848-2942	3-14-97
Betty Ann Jones	10117 Del Almendra	848-2942	3-14-97
Mary Ann Ahner	10120 Del Almendra	848-1427	3-14-97
Bill Ahner	10120 Del Almendra	848-1427	3-14-97
Mike Teresi	9806 Atlas Rd	848-2501	3-14-97
[illegible]	10325 St. Andrews	848-8736	3-16-97
B. Lowe	10325 St Andrews	848-8736	3-16-97
Donna Gordon	10324 St Andrews	847-4177	3-16-97
Erin Gordon	10324 St. Andrews	847-4177	3-16-97
John T. Krieger	10330 St. Andrews Dr.	847-9365	3-16-97
Frances Krieger	10330 St. ANDREWS	847-9365	3-16-97
Frank Salvatore	10300 ST ANDREWS	847-9674	
Ruth Salvatore	10300 St. Andrews Dr.	847-9674	
Judy Thomas	9907 Poppy Hills Dr	847-0993	
[illegible]	9907 Poppy Hills Dr	847-0993	
Jacqueline A Brown	9801 Atlas Rd	847-0574	

We, the undersigned residents of Oakdale would like RoTA service extended East of Town. Pg 2

NAME	Residence	Phone	Date
Marilyn Niles	10331 St. Andrews	847-9512	3/9/97
Lou Niles	10331 St. Andrews Dr	847-9512	3/9/97
Tom Burton	10319 St. Andrews Dr.	848-0012	3/9/97
Gail Burton	10319 St Andrews Dr.	848 0012	3/9/
[illegible]	10312 St Andrews	848 9346	3/9/97
Robert F. Cordova	10318 ST. ANDREWS	8480221	3-9-97
Glenda McCheney	10313 St. Andrews	848-1197	3-9-9
William McCheney	10313 ST ANDREWS DR	848-1194	3-9-97
[illegible]	10307 St. Andrews	847-0029	3/9/9
Laura J Dossi	10307 St. Andrews	847-0029	3-9-9
[illegible]	10312 St Andrews	848 [illegible]	3-9-97
Steve Perez	10306 ST. Andrews	848-3711	3-9-9
Donna Perez	10306 St Andrews	848-3711	3-10-9
Allen Jordan	10324 St. Andrews	847-4177	3-11-97
Jeff Jardine	10300 Dixon	847-9680	3-14-97
[illegible]	10201 Del Almendra Dr.	848-1322	3/14/9
[illegible]	10201 Del Almendra Dr.	848-1322	3/1

We, Oakdale residents, would like to have RoTA extend their service East of town.

Name	Residence	tele #	Date
Cecilia Arpoila	530 mann	847-6315	3/10/97
Bob Arpoila	"	"	"
Monique Stearns	1245 Maple Dr	847-1013	3/18/97
Martin D. Stearns	" "	"	"
Amy Williams	Hwy 120	847-1412	
Jon Williams	Hwy 120		
Carol Stearns	6 Bardon Park Way		
Daniel Stearns	" "	"	847-5643

We, the undersigned residents of Oakdale would like RoTA service extended East of Town.

NAME	Residence	phone	Date
Beverly J Doe	340 California	847-7479	3/8/97
Sharon Hendricks	1717 Snowy River	847-4829	3/8/97
Karen Taylor	1717 Snowy River	847-4829	3/8/97
Josephine Turner	10517 Olive Ave	847-5295	3/12/97
Lillian Western	1449 E. 'F'	847-7075	3/14/97
Alicia Sargent	13239 Valley Home Rd OKdl	847-8958	3/14/97
Olga Zarvas	11517 Oak Hill DR	847-8958	3/14/97
Beatrice Brooke	10136 Cleveland Rd	847-0481	3/15/97
Ruth Linn Qualls	6000 Wilkins	847-0483	3/15/97
[illegible]	10318 St Andrews	848-0221	3-15-97
Rosie Villarreal	1630 West 1st	847-0896	3-18-97

We, the unsigned residents of Oakdale would like ROTA service extended east of town;

Name	Residence	Phone	Date
[illegible]	[illegible]	848-2823	3-14-97
Betty Baker	751 [illegible]		3-14-97
Connie [illegible]	202 Meadow Sack Yard Oakdale		3-14-97
Estelle [illegible]	11000 Walnut Oakdale	847-0164	3-14-97
Florence Butler	8254 Crane Rd		3-14-97
Mary Graves	301 Orsi Rd		3-14-9
Patricia Chaves	327 So Sierra	848-4188	3-14-97

We the undersigned residents of "Oakdale", would like - "ROTA" Service - extended East of town - (Information call - 847-6152 - Nina Clar

Name - Address phone - date;

Brian Munian 877 Riverbluff Dr. 847-8966 3-10-97

Wm Arsenio 2404 Fine Heart 847-3190 3-10-97

Jerry Sadley 1677 Poplar 847-4012 3/10/97

Raymond Mulcahy 1934 - Alta Ct. 847-0866 - 3/11/97

Sharon Schippers 411 N 4th Ave 847-3775 3/12/97

Bill Taylor 1266 Magnolia 847-2028 - 3-18-97

WE, THE UNDERSIGNED RESIDENTS OF OAKDALE WOULD LIKE ROTA SERVICE EXTENDED FURTHER EAST OF TOWN.

NAME: Donna Luke
ADDRESS: 1931 EAST F ST #9
PHONE: 845-2008
SIGNATURE: Donna Luke

NAME: TRACEY M. LUKE
ADDRESS: 1931 E. F ST #9
PHONE: 845-2008
SIGNATURE: Tracey M Luke

NAME:
ADDRESS:
PHONE:
SIGNATURE:

NAME:
ADDRESS:
PHONE:
SIGNATURE:

NAME:
ADDRESS:
PHONE:
SIGNATURE:

NAME:
ADDRESS:
PHONE:
SIGNATURE:

NAME:
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NAME:
ADDRESS:
PHONE:
SIGNATURE:

DENIS SNELL
1051 EAST C ST.
OAKDALE
847-0642

PETITION

TO PROVIDE ROTA { RIVERBANK OAKDALE TRANSPORTATION AUTHORITY } BUS SERVICE TO THE ORANGE BLOSSOM AREA

NAME	ADDRESS
Pat Kuhn	6 Willow Glen
a county responsibility	Oakdale, Calif 95361
Nancy Olivia	350 S. Oak Avenue
City Management 10761 Orange Blossom	Oakdale, Ca 95361
Melissa Ryan	7318 Crane Rd. Oakdale
Patty Cooper	275 S. Oak Ave. Oakdale

We, the unsigned residents of Oakdale would like ROTA service extended east of town;

Name	Residence	Phone	Date
[illegible]	255 [illegible]	847-1112	3-18-97
David Spadini	12919 Lancaster	847-0263	3-18-97
Jim Hager	12919 Lancaster	847-0263	3-18-97
GARY TABOADA	12919 LANCASTER	847-0026	3-18-97
Warren Persing	13254 Lancaster RD	847-9425	3-18-97
Betty Wren			
[illegible]	9607 OAKNOLL AVE		3-19-97
209-848-8800			

We, the [redacted]signed residents of Oakdale would like ROTA service extended east of town;

Name	Residence	Phone	Date
Ivor Mendenhall	11207 Valley Oak Dr.	847-9765	3/11/97
Aldo Gambini	Oakdale 150 C. "A" St	847-0496	3/11/97
Virginia G. Sieg[illegible]	410 N. First Oakdale	847-1804	3/12/97
Kathryn M. Hartratt	752 School Oakdale Ca 95361	847-1658	3-12-97
Cathryn L. Barringer	1039 Poplar Oakdale CA 95361	847-2348	3-12-97
Barbara J. Keeler	926 Poplar St. Oakdale, Ca. 95361	847-1660	3-12-97
Shirley Bracelli	1260 Walnut Oakdale	847-2179	3/12/97
Loma House	1039 Poplar Oakdale	847-2348	3-12-97
M. Voorhees	816 Pine	847-2577	3-12-97
Robert P. Voorhees	816 Pine St	847-2577	3-12-9
Phyllis Gallman	2609 Oakhurst Oakdale	847-2044	
Lee O'Brien	511 Oakridge Dr. Oakdale	847-4349	
Mary Fuig	900 Old Stockton Rd	847-35	
Alice Terrin	9806 Atlas Rd.	848-2501	
Shirley Thrasher	758 Partridge Sq.	847-0824	
Mark Hofmann	2625 Kersten Oak	847-0562	
William Schuppers	411 N 4th Ave	847-3778	
Barbara J. Hall	13749 Lancaster Rd	847-2674	
Charles W. Hall	13749 Lancaster	847-2674	
Mel Sanguinetti	1922 Alta Ct.		
Connie Sanguinetti	1922 Alta Ct	847-765	

WE, THE UNDERSIGNED RESIDENTS OF OAKDALE WOULD LIKE **ROTA** SERVICE EXTENDED FURTHER EAST OF TOWN.

NAME: [illegible]
ADDRESS: 1931 East F St Apt 7
PHONE: 847-1606
SIGNATURE: [illegible]

NAME: Susan Brown
ADDRESS: 912242 Orange Blossom
PHONE: 848-0671
SIGNATURE: Susan Brown

NAME: Becky Geller
ADDRESS: 1913 East F
PHONE: 848-8793
SIGNATURE: Becky Geller

NAME: VERNA FURTADO
ADDRESS: 6506 E. GRAYSON RD.
PHONE: 667-5825
SIGNATURE: Verna Furtado

NAME: Debra Hopper
ADDRESS: 1907 East F St
PHONE: 209-848-8721
SIGNATURE: Debra Hopper

NAME: Ron MORRIS
ADDRESS: 10725 Dixon Rd
PHONE: 847-6245
SIGNATURE: Ron Morris

NAME: Gail Butter
ADDRESS: 10725 Dixon Rd
PHONE: 847-6245
SIGNATURE: Gail Butter

NAME: Chuck Geller
ADDRESS: 1913 East F
PHONE: 848-8793
SIGNATURE: Chuck Geller

LINDA MORRIS
NAME: Linda Morris
ADDRESS: 10725 DIXON RD.
PHONE: 847-6245
SIGNATURE: Linda Morris

NAME: W. D. Hopper
ADDRESS: 1907 East F St
PHONE: 848-4105
SIGNATURE: W. D. Hopper

We, the undersigned residents of Oakdale would like ROTA service extended east of town;

Name	Residence	Phone	Date
[illegible] Mullins	725 Partridge Sq	845-1000	3/13/97
[illegible]	[illegible] Whitewood Ct.	847-650	3/17/97
Jerry Rucker	2613 Kirsten Ct.	847-0929	3/17/97
William T. Dallas	44 Black Pine Way	847-6493	3/19/97
Barbara Craig	9513 Deo Gloria	845-9122	3/18/97
Glenn W Schutt	11500 Wild Oak	847-5411	
[illegible] Wagner	15191 Orange Blossom Rd.	847-0405	

We, the unsigned residents of Oakdale would like ROTA service extended east of town;

Name	Residence	Phone	Date
Sam Galvan	11700 Blue Oak	847 0090	3/14-9
Victoria Galvan	11700 Blue Oak Ln	847-0090	3-14-9
Karen Nikolas	11700 Mountain Oak Rd		3-14 97
Sharon Crawford	Mt Oak	847-8343	3/14/97
[illegible]	10007 MT. OAK	847-8374	3/17

WE, THE UNDERSIGNED RESIDENTS OF OAKDALE WOULD LIKE ROTA SERVICE EXTENDED FURTHER EAST OF TOWN.

NAME: Margie Ackermann
ADDRESS: 329 S Maag
PHONE: 844-3937
SIGNATURE: Mary [signature]

NAME: Peggy Skinner
ADDRESS: 14024 Horseshoe
PHONE: 848-2212
SIGNATURE: Peggy Skinner

NAME: Chuck Ackermann
ADDRESS: 329 S Maag
PHONE: 844-3937
SIGNATURE: Chuck Ack[illegible]

NAME: Barbara Cuntright
ADDRESS: 1922 Pondersa Dr
PHONE: 848-0335
SIGNATURE: Barbara Cuntright

NAME: Mary P. Silveira
ADDRESS: 1829 Hosemite
PHONE: 838-2370
SIGNATURE: Mary P. Silveira

NAME: Sharon Weber
ADDRESS: 706 Valley View
PHONE: 845-0605
SIGNATURE: Sharon Weber

NAME: Cheryl Garcia
ADDRESS: 5570 So. Maag
PHONE: 847-0816
SIGNATURE: Cyca Garcia

NAME: Donna Baker
ADDRESS: 410 Dodge
PHONE: 209-847-7451
SIGNATURE: Donna Baker

NAME: J. Lind
ADDRESS: 715 West F
PHONE: 847-[illegible]
SIGNATURE: [signature]

NAME: Glenna Martin
ADDRESS: 1212 [illegible] St
PHONE: 847180[illegible]
SIGNATURE: [signature]

WE, THE UNDERSIGNED RESIDENTS OF OAKDALE WOULD LIKE **ROTA** SERVICE EXTENDED FURTHER EAST OF TOWN.

NAME: Paula Burgess
ADDRESS: 221 Fairwood Dr Oakdale
PHONE: 848-0820
SIGNATURE: Paula Burgess

NAME: Paul Shore
ADDRESS: 1491 Poplar
PHONE: 847-2367
SIGNATURE: Paul Shore

NAME: Cheryl Azevedo
ADDRESS: 7112 Paterson Rd
PHONE: 848-8481
SIGNATURE: Cheryl Azevedo

NAME: April Smejkal
ADDRESS: 7271 Adams Gravel Plant Rd
PHONE: 869-6967
SIGNATURE: April Smejkal

NAME: Valerie Heffner
ADDRESS: 2001 Sawyer Ave
PHONE: 848-0259
SIGNATURE: Valerie Heffner

NAME: Stacy Fields
ADDRESS: 9801 Roldan Rd.
PHONE: 847-8972
SIGNATURE: Stacy Fields

NAME: Lorraine M. Simas
ADDRESS: 4137 Oakdale Waterford Hwy
PHONE: 847-1993
SIGNATURE: Lorraine M. Simas

NAME: [illegible]
ADDRESS: 460 Senorita Court
PHONE: 847-4064
SIGNATURE: [illegible]

NAME: Jenice Arellano
ADDRESS: 5106 Lanark Rd
PHONE: 869-4937
SIGNATURE: Jenice Arellano

NAME: Lucy Espina
ADDRESS: ~~1114 60~~ Roldan Rd
PHONE: 847-8910
SIGNATURE: Lucy Espina

WE, THE UNDERSIGNED RESIDENTS OF OAKDALE WOULD LIKE **ROTA** SERVICE EXTENDED FURTHER EAST OF TOWN.

NAME: Gina Chau
ADDRESS: 1440 Ranch House Ct
PHONE: 847-5650
SIGNATURE: Gina Chau

NAME: TIFFANI BERGERON
ADDRESS: 1419 WEST EST. C
PHONE: 847-6294
SIGNATURE: Tiffani Bergeron

NAME: JOEAN HAND
ADDRESS: 13425 ORANGE BLOSSOM
PHONE: 847-2132
SIGNATURE: Joean Hand

NAME: Denette Snyder
ADDRESS: 584 Hi tech Parkway
PHONE: 847 9104
SIGNATURE: Denette Snyder

NAME: Charlotte Sain
ADDRESS: 730 East F #E
PHONE: 209-847-5667
SIGNATURE: Charlotte Sain

NAME: Melinda Costa
ADDRESS: 21338 S. Seidner, Escalon
PHONE: E- 838-2017
SIGNATURE: Melinda Costa

NAME: Irene Lester
ADDRESS: 900 Old Stockton Rd #546
PHONE: 848-1160
SIGNATURE: Irene Lester

NAME: Lub. Pincabare
ADDRESS: 820 Millsuffer Ct
PHONE: 847 1008
SIGNATURE: Lub. Pincabare

NAME: Shalon Kirsini
ADDRESS: 22 Stanislaus
PHONE: 847 5873
SIGNATURE: Shalon Kirsini

NAME: Erma Chappell
ADDRESS: 235 Ca. Cut
PHONE: 847-0872
SIGNATURE: Erma Chappell

WE, THE UNDERSIGNED RESIDENTS OF OAKDALE WOULD LIKE ROTA SERVICE EXTENDED FURTHER EAST OF TOWN.

NAME: Lori Kavanaugh
ADDRESS: 9612 Allende Lane
PHONE: Oakdale
SIGNATURE: [signature]

NAME: Melanie Shatswell
ADDRESS: 9316 E A Street
PHONE: 847-1080
SIGNATURE: Melanie Shatswell

NAME: Bonnie Gatzman
ADDRESS: 17091 Victory Rd
PHONE: Oakdale
SIGNATURE: Bonnie Gatzman

NAME: Mika Krick
ADDRESS: 17455 Sonora Rd.
PHONE: Knights Ferry, ca 95361
881-3232
SIGNATURE: [signature]

NAME: Cher Bains
ADDRESS: 557 S. Muaj
PHONE: 847-0816
SIGNATURE: Cher Bains

NAME: Ken Burgess
ADDRESS: 221 Fairwood Dr
PHONE: 848-0808
SIGNATURE: Ken Burgess

NAME: Liz Weaver
ADDRESS: 2100 Navajo Ct
PHONE: 848-3672
SIGNATURE: Liz Weaver

NAME: Patty Morris
ADDRESS: 17937 Rodden Rd.
PHONE: 847 9258
SIGNATURE: Patty Morris

NAME: Lei Colombo
ADDRESS: 1029 Knight
PHONE: 847-5462
SIGNATURE: Lei Colombo

NAME: Rosie Williams
ADDRESS: 417 East F St
PHONE: 848-3404
SIGNATURE: [signature]

WE, THE UNDERSIGNED RESIDENTS OF OAKDALE WOULD LIKE **ROTA** SERVICE EXTENDED FURTHER EAST OF TOWN.

NAME: Loc Chau
ADDRESS: 1440 Ranchhouse Ct.
PHONE: 847-5160
SIGNATURE: Loc Chau

NAME: Janice Ramos
ADDRESS: 9807 Oak Knoll
PHONE: 847-3855
SIGNATURE: Janice Ramos

NAME: Greg Carlson
ADDRESS: 422 W. I St.
PHONE: 847-2817
SIGNATURE: Greg Carlson

NAME: Jennifer Ling
ADDRESS: 10712 Rawles Rd.
PHONE: 847-7973
SIGNATURE: Jennifer Ling

NAME: Sabrina Marquedt
ADDRESS: 153680 Orange Blossom Rd
PHONE: 847-1051
SIGNATURE: Sabrina Marquedt

NAME: Chuck Murphy
ADDRESS: 153680 Orange Blossom
PHONE: 847-1051
SIGNATURE: C. Murphy

NAME: Gail Dillard
ADDRESS: 13641 Orange Blossom
PHONE: 847-5219
SIGNATURE: Mrs. G. Dillard

NAME: Jerry McBride
ADDRESS: 153680 Orange Blossom
PHONE: 847-1051
SIGNATURE: Jerry McBride

NAME: Augustine Ramos
ADDRESS: 9807 Oak Knoll
PHONE: 847-3855
SIGNATURE: Augustine Ramos

NAME: Daniel McCormick
ADDRESS: 9807 Oak Knoll
PHONE: 847-3855
SIGNATURE: Daniel McCormick

WE, THE UNDERSIGNED RESIDENTS OF OAKDALE WOULD LIKE **ROTA** SERVICE EXTENDED FURTHER EAST OF TOWN.

NAME: Debby Gilton
ADDRESS: 4500 Oak Knoll
PHONE: 847-6444
SIGNATURE: Debby Gilton

NAME: Beatrice Friedman
ADDRESS: 1042 Riverbluff
PHONE: 847-7762
SIGNATURE: Beatrice Friedman

NAME: Vicki Lodaz
ADDRESS: 10011 Oak Knoll
PHONE: 848-4848
SIGNATURE: Vicki Lodaz

NAME: Janet Billings
ADDRESS: 210 Kern Creek Way
PHONE: Oakdale 848-[illegible]
SIGNATURE: Janet M. Billings

NAME: Linda Borrelli
ADDRESS: 11500 Pinoak
PHONE: 847-6658
SIGNATURE: Linda Borrelli

NAME: Lois Matherly
ADDRESS: 270 Trevor Ave.
PHONE: 847-4208
SIGNATURE: Lois Matherly

NAME: Sandie Henslee
ADDRESS: 11500 Silver Pat
PHONE: 847-4749
SIGNATURE: Sandie Henslee

NAME: Linda O'Hearn
ADDRESS: 11707 Brookside
PHONE: 847-0307
SIGNATURE: Linda O'Hearn

NAME: [illegible]
ADDRESS: [illegible]
PHONE: 847-8622
SIGNATURE: [illegible]

NAME: Cindy Gilton
ADDRESS: 9721 Partridge Ct.
PHONE: 845-0615
SIGNATURE: [illegible]

WE, THE UNDERSIGNED RESIDENTS OF OAKDALE WOULD LIKE **ROTA** SERVICE EXTENDED FURTHER EAST OF TOWN.

NAME: Vim Stogdell
ADDRESS: 1163 S Crow Creek
PHONE: 848-1217
SIGNATURE: Donald Stogdell

NAME: Melaine Bates
ADDRESS: 14830 Bond Ave
PHONE: 848-3176
SIGNATURE: Melaine Baty

NAME: Donald Young
ADDRESS: 1111 H. ST.
PHONE: 847-8204
SIGNATURE: Donny Young

NAME: Terry Esparza
ADDRESS: 804 Pine Ave
PHONE: 847-5711
SIGNATURE: Terry Esparza

NAME: Jeff Vanhorn
ADDRESS: 150 S Oak ST.
PHONE: 847-4733
SIGNATURE: Jeff Vanhorn

NAME: Murrell Esparza
ADDRESS: 804 Pine Ave
PHONE: 847-5711
SIGNATURE: Murrell Esparza

NAME: Dwayne Batey
ADDRESS: 14830 Bond Ave
PHONE: 848-3176
SIGNATURE: Dwayne Batey

NAME: Donald Stogdell
ADDRESS: 1163 S Crow Creek
PHONE: 848-1217
SIGNATURE: Dim Stogdell

NAME: Kathleen Vanhorn
ADDRESS: 150 S Oak
PHONE: 847-4733
SIGNATURE: Mrs. J. Vanhorn

NAME: Christy Martin
ADDRESS: 529 West F. St
PHONE: 848-0511
SIGNATURE: Christy Martin

WE, THE UNDERSIGNED RESIDENTS OF OAKDALE WOULD LIKE ROTA SERVICE EXTENDED FURTHER EAST OF TOWN.

NAME: Jody Henderson
ADDRESS: 111 S. Maag St.
PHONE: 848-2127
SIGNATURE: Jody Henderson

NAME:
ADDRESS:
PHONE:
SIGNATURE:

NAME: Wanda Villagrana
ADDRESS: 660 Adams Rd
PHONE: 847-8257
SIGNATURE: Wanda Villagrana

NAME:
ADDRESS:
PHONE:
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SIGNATURE:

WE, THE UNDERSIGNED RESIDENTS OF OAKDALE WOULD LIKE **ROTA** SERVICE EXTENDED FURTHER EAST OF TOWN.

NAME: Janet L. Monroy
ADDRESS: 11600 Orange Blossom
PHONE: 848-8521
SIGNATURE: Janet L. Monroy

NAME: Lynne Sell
ADDRESS: 645 Nelson Ct Oakdale
PHONE: 848-1117
SIGNATURE: Lynne Sell

NAME: Judy Gillum
ADDRESS: 860 S Stearns
PHONE: 209-847-7111
SIGNATURE: [illegible]

NAME: Veronica Soldine
ADDRESS: 2605 Stanislaus
PHONE: 869-2282
SIGNATURE: Veronica Soldine

NAME: Lynn O'Nordin
ADDRESS: 9436 Hadden Rd
PHONE: 847-4570
SIGNATURE: Lynn O'Nordin

NAME:
ADDRESS:
PHONE:
SIGNATURE:

NAME: Roy W. Nordin
ADDRESS: 9436 Hadden Rd
PHONE: 847-4570
SIGNATURE: Roy W. Nordin

NAME:
ADDRESS:
PHONE:
SIGNATURE:

NAME: Brandy Hawkins
ADDRESS: 6042 Deleon Way
PHONE: 869-5044
SIGNATURE: Brandy Hawkins

NAME:
ADDRESS:
PHONE:
SIGNATURE:

WE, THE UNDERSIGNED RESIDENTS OF OAKDALE WOULD LIKE ROTA SERVICE EXTENDED FURTHER EAST OF TOWN.

NAME: [illegible]
ADDRESS: [illegible]
PHONE: 848-[illegible]
SIGNATURE: [illegible]

NAME: John Madden
ADDRESS: 111 Mana Rd
PHONE: 847-4761
SIGNATURE: [illegible]

NAME: Tamra Taylor
ADDRESS: 9806 Oak Knoll Dr.
PHONE: 848-1242
SIGNATURE: Tamra S. Taylor

NAME: Buddy Taylor
ADDRESS: 9806 Oak Knoll AVE
PHONE: 848-1242
SIGNATURE: [illegible]

NAME: Wendy J. Lorenz
ADDRESS: 9806 Oak Knoll AVE
PHONE: 848-1242
SIGNATURE: Wendy J. Lorenz

NAME:
ADDRESS:
PHONE:
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PHONE:
SIGNATURE:

We, the unsigned residents of Oakdale would like ROTA service extended east of town:

Name	Residence	Phone	Date
Alice M. Clipper	796 Pine St	847-0868	3-11-97
Bernadine A. Adams	470 E A st Apt 122		3-11-97
Naomi L. Watson	33 Willow Glen		3-11-97
Ann Reiff	605 Eucalyptus Ave		3/11/97
Karin Richardson	14817 Orangeblossom Rd		3/11/97
Suzette Vitus	11410 Scarlet Oak Dr	848-3523	3-11-97
Mervin Amerine	2401 Pinehurst Dr.	847-7177	3/11/97
Lila Sensency	243 N. Stone Oak	668-4181	3/11/97
Dale Sloan	78 Obsidian Dr	847-8207	3/11/9
[illegible]	411 N. 4th Ave	847-1802	3-14
Alice M. Garcia	831 East D. Oakdale Ca		3/14/97
Glenn Taggart	13239 Valley Home Rd Oakdale	847-8958	3/14/97
Cynthia Miller	12435 Horseshoe Rd Oakdale		3/15/97
Jack Green	141 S 6th apt 101 Oakdale		3/15/97
Corinne Reid	1578 East D' St. Oakdale		3-16-9
Richard Davis	1538 Taggart St Oakdale		3-15
Stasia Davis	1538 Taggart St Oakdale		3/15/97
Nora W. Evans	1526 Taggart St. Oakdale		3/15/97
[illegible]	1526 Taggart St Oakdale		3/15/97
[illegible]	1514 Taggart St Oakdale		3-15-97
[illegible]	1514 Taggart St Oakdale		3-15-97

We, the unsigned residents of Oakdale would like ROTA service extended east of town:

Name	Residence	Phone	Date
Myron D. Hanson	9801 Jackson Rd.	847-2077	-3-11-97
Kimberly S. Green	10121 Del Almendra	847-3727	3-11-97
Rebecca L. Drischott Pr	1218 1399 Fair Oaks St Oakdale	847-3714	3-11-97
Roseanne Fernsberg	10241 Whitetail Oakdale	8475182	3-11-97
Paula Sexton	10206 Buckmeadow Oakdale	8474807	-3-11
Dineen Sisson	10242 Whitetail D. Oakdale	848.9544	
Donna Anderson Allen	355 Johnson Oakdale	847-6[illegible]	3-
Marion W. [illegible]	Oakdale St		
Shirley Williams	12624 Lancaster Oakdale	847.5355	3-11-9
Micky McCann	240 N. Oak.	847-2293	3-11-
Ethel Jean Berger	2604 Oakhurst Dr. Oakdale	95361	
[illegible]	1019 Magnolia Oakdale	847-0958	
Dona Farruggia	→	8474457	
Charles Farruggia	1929 Sugar Pine → Oakdale Cal		
Betty C. Greger	7206 Crane R. Oakdale, CA	95361	
Clifford E. Greger	7206 Crane R. Oakdale Ca	95361	
Wanda Thacker	758 Partridge Sq Oakdale	9536	
Elizabeth J. Wagner	5467 River Rd	847-3881	3-11-97
Connie J. Gardner	1293 Caballero St	848-8511	3-11
Violet J. Shebley	1237 Magnolia	848-0852	
[illegible]	11506 [illegible]	847-19[illegible]	
[illegible] E. Cullings	312 N. Birdwell	847-[illegible]	

We, the unsigned residents of Oakdale would like ROTA service extended east of town:

Name	Residence	Phone	Date
Darlene Silva	1858 Pontiac St.	847-2433	3-11-97
Mary Allen	738 Partridge Sq.	847-8558	3-11-97
Gwen Anderson	1657 Mark Cst	847-8693	3 11 97
Linda Shaw	259 N. 1st/ Ave	847-7188	3-12-97
Linda Gilton	1222 Allen St	847-6475	3-12-97
Linda Thompson	1449 E "F" St	847-6943	3-12-97
Gary [illegible]	1261-W. "J" St	847-2397	3-12-97
Faye Johnson	260 W. J St	847 4300	3-12-97
DENISE PORTER	1657 CROWCREEK DR.	847-8663	3-12-97
Karen Bianchi	13500 Valley Home Rd Oakdale	847-6694	3-12-
Shirley McPhee	17201 Hwy 120 Oakdale	847-9543	3/12/97
[illegible]	11405 VALLEY OAK DR	847-7648	3-12/97
Gloria Walsh	284 W "J" ST.	847-4529	3-13-97
Alice Highfill	847-2185	3-13-97	
[illegible]	874-3646	3-13-97	
Gary Hubble	847-2397	3-13-97	
Dottie Barth	847 6197	3-13-97	
Esther Brownell	847-5186	3/13/97	
Marie Reynolds	1431 Pontiac St.	3/13/97	
Mary [illegible]	250 [illegible]	3-13-97	
[illegible]	[illegible]	3/13/97	

We, the unsigned residents of Oakdale would like ROTA service extended east of town:

Name	Residence	Phone	Date
Dennis Mattox	281 REARDON ST	848-1730	3-17-97
Nina W. Clark	289 Reardon	847-6152	3-17-97
Carol Fatherington	242 [illegible]	847-6247	3-17
Joan Johnson	10431 Alvarado Rd	847-9788	
Margaret Metzger	10013 Plaza De Oro	847-0643	3-
Fred Langdowne	900 Old Stockton Rd	847-3277	3-18-97
Karen Leeper	148 Church Ave	847-3246	3/18/97
Connie Anderson	10212 Buckmeadow	847-5406	3-18-97
Rosalind Dallas	44 Black Pine Way	847-6493	3-18-97
Vicki Prola	273 Reardon St. Oakdale	848-0353	(3-18-9
Nellie Parker	1525 East "D" St Oakdale	847-3574	(3-18
Lena Louise Angeli	1502 Taggart St - Oakdale	845-1420	3-17
James K Angeli	1502 TAGGART ST OAKDALE	845-1420	3-18-97
Floy Worden	2385 Pontiac St. Oakdale	848-8739	3/18/97
WENDE WHERRY	10528 Hwy 120	848-7221	
Lucy Pacheco	183 Warrington Ave.	847-1259	

We, the undersigned residents of Oakdale would like ROTA service extended east of town;

Name	Residence	Phone	Date
Bertha Albright	12536 Lancaster Rd	847-3971	3/14/97
Ronald R Hand	13425 Orange Blossom	847-2132	3/14/97
Valentina Scheremetiev	13357 Lancaster Rd.	847-0130	3/14/97
Porter F Morton	13353 Lancaster Rd	848-2829	3/14/97
Dimitry Kusmenko	13349 Lancaster Rd	848-3143	3/14
Dennis G Wren	13329 Lancaster Rd	848 1300	
Betty L Wren	" "	"	"
Terry Russell	12719 "	"	8470026
Muriel F Anderson	12650 Lancaster Dr	848-9148	
Donna M Fisher	12630 Lancaster Rd.	847-6555	
Douglas & Nancy Sutton	12724 Lancaster Rd	847-7319	
Roger B. Kerba Chenes	9905 Stanislaus Rd	847-9494	Oakdale
Mary J Kerba	12690 Orange Blossom Rd	8475552	
Debbie Acierto	10201 Gray Rd. Oakdale, Ca.	9536	
Fernie Acierto	10201 Gray Rd. Oakdale, Ca.	9536	
Cheryl Thompson	10203 Gray Rd Oakdale Ca		
Tommy Reinhardt	10213 Gray Rd Oakdale Ca		
[illegible]	12455 Orange Blossom Rd Oakdale Ca	847-7449	
[illegible]	12455 Orange Blossom Oakdale Ca	847-7449	
Kat [illegible]	12455 - Orange Blossom Oakdale Ca	847-7449	

Questions may be addressed to Nina Clark at 847-6152

[illegible]

We, the unsigned residents of Oakdale would like ROTA service extended east of town;

Name	Residence	Phone	Date
Lone E. Corrigan		847-4433	3-12-97
Mary K Johnson	10037 Sierra Rd	847-2890	3/12/97
Byrle Bice	9537 Wumble Rd, Oakdale	847-1350	3-10-97
Lois Warner	429 Terrasol Lane Oakdale	847-0416	3/12/97
Don S. Williams	12624 LANCASTER RD. Oakdale	847-5355	3-12-97
Barbara Rego	276 Reardon St. Oakdale	8458047	3-11-97
Roland Rego	276 Reardon St Oakdale		3/11/97
Linda Hardaway	292 Reardon St. Oakdale, CA		3/11/97
Darrell L. Hardaway	292 REARDON ST. OAKDALE, CA		3-11-97
Linda Miller	10754 Dixon Oakdale Ca.	847-7170	3-11-97
Howard Miller	10754 Dixon Oakdale Ca.	847-7170	3-11-97
Gina Diaz	1399 Sand Hill Ct. Oakdale, Ca		848-1458
Michelle Raynal	451 E. 1st	848-4881	3-12-97
Shirley Covert			3-12-97
Shirley Fordinan	364 Caballos		3-12-97
RAMONA D. HULTZ	724 MARIA CT.		3-12-97
Richard Bloops	10136 Cleveland Rd	847-0481	3/15/97
Steve Reed	10631 Olive Oakdale		3-15-97
Frankie Mitchell	1037 E D St Oakdale Calif		3-17-97
Carmen Salinas	1500 E D St Oakdale CA	847-0429	3-17-97
Lupe Quilman	1500 E D St Oakdale Ca.		3-17-97

We, the undersigned residents of Oakdale would like ROTA service extended east of town;

Name	Residence	Phone	Date
[illegible]	112 [illegible] Rd	841-4[illegible]3	3/16/97
[illegible]	2110 Pontiac St.	848-3427	3/15/97
Julia Haidlen	10722 Rawles Rd	847-4517	3/16/97
[illegible]	2110 Pontiac St	848-3427	3/15/97
Kristin Gilbert	10206 Whitetail Dr.	847-4564	3/16/97
[illegible]	2708 [illegible] Dr	847-7407	3/16/97
Diane Siemsen	209 Fairwood Dr	847-8676	3/16/97
David Gilbert	10206 Whitetail	847-4564	3/16/97
Marshall Clapp	796 Pine St.	847-0868	3-16-97
Sandra Salinas	1530 E D St. Oakdale CA	847-6429	
Ollie Lee Nichols	1537 E.D. Oakdale Ca	847-6842	
Ernie Sala	296 Trevor Ave Oakdale	848-3121	
Mark Gutman	[illegible] East D Oakdale	848-3909	
[illegible]	[illegible] East D St. Oakdale	848-3909	
Tony Salas Jr.	296 Trevor Ave Oakdale	847-6702	3-17-97
[illegible]	296 Trevor Ave Oakdale	847-4[illegible]	3-17-[illegible]
Tony [illegible]	[illegible] Trevor Ave Oakdale	[illegible]	3-17-9[illegible]
Ronda Salas	296 Trevor Ave Oakdale	847-6702	3-17-[illegible]
Rick Clark	[illegible] Antonia St. OAKDALE	847-[illegible]	3-[illegible]
[illegible]	[illegible] Oakdale	[illegible]	

Questions may be addressed to Nina Clark at 847-6152

WE, THE UNDERSIGNED, WOULD LIKE ROTA SERVICE EXTENDED EAST OF TOWN

NAME	RESIDENCE	PHONE NO.	DATE
Jane Yedwabnick	1400 Walnut St	847-5496	3/11/97
Dorothy Young	222 Schw St	847-1820	3-11-97
Marion Fisher	726 PARTRIDGE SQ	847-3843	3-11-97
Myrtle Pedersen	570 Del Rio Cr.	847-5853	3-11-97
[illegible] Turell	1245 W. J. St	847-4170	3-11-97
Harriet Wuchezer	1085 River Ave	848-8121	3-11-97
Dorothy B. Engler	436 W. I St	847 1537	3-11-97
Stephana Olson	811 East "C" St	847-8434	3-11-97
Vera Ugalde	202 N. 6th Ave	847-0550	3/11/97
Marion C. Macdonald	160 School Ave	847-0479	3/11/97
Alexandrina Lima	1315 Fair OAKS	847-65	3/11/97
Julia [illegible]	558 Laurel Ave.	847-4311	3-11
Madeline Cambra	366 Ash Ave.	847-1789	3/11/97
Kathleen Henton	348 Ash Ave		3-11-97
Dolores Martinson	835 Cliffside Court	848-0509	3-11-97
Marialese E. Hansen	1320 Walnut	847-1028	3-11-97
Don Black	517 Del Rio	847-4528	3-11-97
Edward L. Pedersen	570 Del Rio	847-5853	3-11-97
Rosemarie Olson	855 Villa Vista	848 0327	3-13-97
Vera P. Ugalde	202 N. 6th Ave	847-0550	3-13-97
[illegible]	900 [illegible]	P. 848 3350	9-13-
[illegible]	[illegible]	[illegible]	[illegible]

We, the unsigned residents of Oakdale would like ROTA service extended east of town;

Name	Residence	Phone	Date
Gayle Johnson	1135 Poplar St Oakdale	848-0626	3-15-97
[illegible]	1735 E 6th Oakdale	847-6041	3-15-97
Carla [illegible]			3-18-97
Katina Townsend	506 Ventanas Ave Oakdale	848-1172	3-18-97
Michelle Wharton	230 N. 7 ave Oakdale	848-9306	3-18-97
[illegible]	1106 Stan Ave. Waterford		3-18-97
[illegible]	Horseshoe Rd		3-18-97
Sarah Frared	Horseshoe Rd		3-18-97
Lawrence Weber	Smithwood	847-2369	3-18-97
[illegible]	Atlas Rd.	848-1032	
Gail Andrews	Bruen Bluff Ct	847-0761	3/18/97
[illegible]	183 Washington	847-2597	
Jolyne Cummins	PO 173	847-1543	
Sarah L	319 West F St		3-19-97
Maricela Luna	208 South 5th Ave	847-2195	3-19-97
[illegible]	1275 East 'F' st Oakdale	847-3730	
Emedina Cadenas	1275 East "F st Oakdale	847-3730	—
Nancy E Blankenship	1275 E. F Street Oakdale	9536	
[illegible]	1275 E F St Hz, Oakdale		3-19-97
[illegible]	315 Cleveland Way Oakdale		3-19-97
Carol Johnson	529 Del Rio Oakdale		

We, the undersigned residents of Oakdale would like RoTA service extended East of Town.

NAME	Residence	Phone	Date
James Kell	529 Poplar	847 7560	3-7-97
Sicki Kell	529 Poplar	847-7560	3-8-97
Madelyn Tolman	11331 Scarlet Oak Dr.	848-8226	3-8-97
Eleon Tolman	11331 Scarlet Oak Dr	848-8226	3-8-97
Dorothy Hofman	2625 Kersten St	847-0562	-3-9-9
Betty Arsenis	2404 Pinehurst	847-3190	3-10-97
Hugo Diaz	249 Reardon St.	848-3815	3-10-97
Juanita J. Kennedy	297 Reardon St.	848-0972	3-10-97
David C. Kennedy	297 REARDON St	848-0972	3/10/97
Rosemary Robertson	317 Trevor Ave	847-8399	3/10/97
Mrs. Michael Hodnik	345 Trevor Ave	847-7600	3/10/97
Mr. Michael A Hodnik	345 Trevor Ave	847-7600	3/10/97
R.J. MANGANO	377 TREVOR AVE	847-5214	3-10-97
Mignon Ripley	9605 La Posada Dr	847-2043	3/11/97
Lynnette Bumgarner	257 Reardon St.	847-5292	3-11-97
Charles Bumgarner	257 Reardon St	847-5292	3-11-97
[illegible] Lorea	1019 Magnolia	847-[illegible]958	3-11-97
[illegible]	311 E. [illegible]	[illegible]	[illegible]

APPENDIX C

The following ten letters were received in response to the proposal for service to the East Oakdale area. They are as follows:

1. A hand written letter from Mary Crippes, who lives on Oak Knoll Avenue, requesting service to the East Oakdale neighborhood.

2. A letter from Ms. Madelyn Tolman requesting transit service. Staff interprets the reference to "east of town" to be to the East Oakdale area, and thus includes the letter with the other correspondence requesting this service.

3. A handwritten letter from Ms. Jeanne Miller, who resides on Dixon Road, east of Oakdale.

4. A handwritten letter from a Ms. Gloria Gaston (sp), who also requests that transit be established in the East Oakdale area.

5. A letter from Ms. Linda Keirn, who requests transit service to the East Oakdale area, and even as far as the Knights Ferry area.

6. A letter from a Ms. Marlene Egeres (sp), who also requests transit service to the East Oakdale area, and as far east as Knights Ferry.

7. A letter written by a Mr. George Janes (sp), who also requests transit service to the East Oakdale area and to Knights Ferry.

8. A handwritten letter from a Ms. Kristin Gilbert, who requests service to the East Oakdale area.

9. A letter written by a Mr. Herschel Pence, a Ms. Louise Pence, and a Ms. Nadine Pence, expressing a desire for transit to operate in the East Oakdale area. Their address is actually a few miles east of the Orange Blossom Bridge, outside of the area analyzed in the report.

10. A letter written by a Ms. Bertha Olbrecht, who requests transit service to the East Oakdale area.

11. A letter written by a Mr. Sam Galvan, who lives in the East Oakdale area, and requests transit service there.

MARY CRIPPES
9807 OAK KNOLL AVE
OAKDALE CALIF

DEAR TESS;

THIS LETTER IS IN REGARD
TO EXTENDING ROTA OUT
FURTHER EAST OF OAKDALE.
AS YOU KNOW NINA CLARK
I ARE GETTING TOGET
ROTA OUT HERE. IT IS THE
ONLY WAY I + MANY OTHERS
CANGET INTO OAKDALE,
ASIDE A TAXI. BUT USON
A SMALL INCOME REALLY

(2)

CANNOT AFFORD A TAXI
OFTEN.

PLEASE, PLEASE, PLEASE
DO WHAT YOU CAN TO HELP
US OUT HERE IN THE
ORANGE BLOSSOM AREA

SEE YOU ON JONELL
AT THE MEETING

SINCERELY
MARY Cryer

April 23, 1997

Tess Nguyen
1025 15th Street
Modesto, CA 95354

Dear Ms. Nguyen,

I read an article in the newspaper about the possibility that we may get public transportation east of town. I would like that very much. There are a lot of folks in our area that would take advantage of the service if it were offered to them.

Sincerely,

Madelyn Brown

April 24, 1997

SAAG
1025-15th St.
Modesto, CA 95354

Dear Ms. Nguyen:

Those of us living in the heavily populated area between Stearns and Orange Blossom Roads in Oakdale often find transportation very difficult. People I have met who have been able to use ROTA praise it highly. It would be very helpful if this service could be extended to us in the area mentioned above, and I hope you can please bring this matter to the attention of the association which you represent.

Thank you.

Yours truly,

Jeanne D. Miller
10543 Dixon Rd
Oakdale, CA. 95361

Att: Jess Nguyen

I have several older friends that live in the Oranzblossom Hillwood area that really need transportation into town for doctor appointments & grocery shoppin as they are getting older and cannot drive anymore. Please extend the Rota services out to East of Stearns road. The demand is there

Thank you Glorie Easton
847-8814

April 1997

Tess Nguyen
c/o SAAG
1025 - 15th St.
Modesto, CA 95354

Re: Expanded ROTA Service to the Orange Blossom Road and Knights Ferry Areas

I am writing to strongly urge that the ROTA transportation services be expanded to include all of Orange Blossom Road and as far as, and including the Knights Ferry area. Many people live out this way who go to Oakdale for such necessary things as shopping, school, and medical appointments. I am sure it would be a valuable service to quite a few others as well as myself.

Sincerely,

Lida R Kerin
14071½ Orange Blossom Rd
Oakdale Ca. 95361

April 1997

Tess Nguyen
c/o SAAG
1025 - 15th St.
Modesto, CA 95354

Re: Expanded ROTA Service to the Orange Blossom Road and Knights Ferry Areas

I am writing to strongly urge that the ROTA transportation services be expanded to include all of Orange Blossom Road and as far as, and including the Knights Ferry area. Many people live out this way who go to Oakdale for such necessary things as shopping, school, and medical appointments. I am sure it would be a valuable service to quite a few others as well as myself.

Sincerely,

Marlene M Egerer
14071 Orange Blossom Rd
Oakdale, Calif 95361

April 1997

Tess Nguyen
c/o SAAG
1025 - 15th St.
Modesto, CA 95354

Re: Expanded ROTA Service to the Orange Blossom Road and Knights Ferry Areas

I am writing to strongly urge that the ROTA transportation services be expanded to include all of Orange Blossom Road and as far as, and including the Knights Ferry area. Many people live out this way who go to Oakdale for such necessary things as shopping, school, and medical appointments. I am sure it would be a valuable service to quite a few others as well as myself.

Sincerely, [illegible]
14071 ½ Orange Blossom
Oakdale Ca. 95354

4/8/97

Dear Tess,

I am writing this letter in support of the ROTA service being extended to serve the eastern part of Oakdale. This area encompasses Sunset Oaks, Deo Gloria and Deerfield Estates.

As a parent of 4 children, ranging in ages from 2 to 14 years, ~~Because of our~~ I am very interested in utilizing ROTA service for my 2 eldest children who are involved in many activities. My estimation is that we would use ROTA between 3 and 10 times weekly. Our children swim for the Oakdale Rec Swim Team, & it would be very convenient to send them back and forth on the bus. We have several neighbors who also participate in swim team, and I can envision quite a group going to, and coming from S.T. practice.

There are many elderly people in this area, as well as many

busy parents who would find great convenience with the RTA service extending to eastern Oakdale.

Thank you,

Kristin M. Gilbert
847-4564

April 11, 1997

Tess Nguyen
c/o SAAG
1025 - 15th St.
Modesto, CA 95354

Re: Expanded ROTA Service to the Orange Blossom Area

My parents and I live on Orange Blossom Road about seven miles east of Oakdale. My father, Herschel Pence, has macular degeneration and is no longer able to drive. He would very much like to have bus service available so that he could go to town independently. He uses an electric scooter and we understand that the ROTA buses have lifts for scooters and wheelchairs.

My mother, Louise Pence, and I, Nadine Pence, are both still able to drive. However, I use a wheelchair at all times and my mother is 83 years old. It is impossible to know what the future holds, and when we might all three be dependent on others for transportation to Oakdale for shopping, medical appointments, etc.

The three of us would like to strongly urge that everything possible be done to expand transportation service to the Orange Blossom Road area.

Sincerely,

Herschel D. Pence

Herschel D. Pence

Laura Louise Pence

Louise Pence

Nadine Pence

Nadine Pence
14069 Orange Blossom Rd.
Oakdale, CA 95361-9513
847-4818

copy to: Mickey Peabody, Oakdale City Council

April 8, 1997

To: Tess Nguyen
1025 15th Street
Modesto, CA 95354

From: Bertha Olbrycht
12836 Lancaster Rd.
Oakdale, CA. 95361

Re: Extension of public transportation service of Oakdale Follow up of Oakdale group attendance at March SAAG meeting by Nina Clark, Mary Crippes, Bertha Olbrycht and petitions presented by Dennis Snell.

Dear Tess Nguyen,

I was impressed with the concerns SAAG officials expressed and allowed to be expressed at the March meeting.
It gives one a good feeling about Stanislaus County Government.

This isn't the first time requests were made to extend public transit service east of Oakdale. Years ago I attended transit need meetings. John Martin, the CEO of SOSP was very helpful and understanding of our needs. He tried and we tried and that was all. Somewhere we got lost. Altimatley word was passed that designated transportation need funds went for road repairs etc. As you know, since then housing and population has more than doubled east of Oakdale. More extensive subdivisions are being planned all the way to Knights Ferry.

The very week of the March SAAG meeting was also the week the Modesto Bee and Oakdale Leader showed graphic accounts of tragic traffic accidents along Hwy 120 east of Oakdale. I live on Lancaster Rd. which was the old Sonora Hwy 120. I doubt there is another area in Stanislaus County, that has more death and near death related accidents than this area along Hwy 120 beyond Orange Blossom and Lancaster Road. For years and years fire truck and ambulance sirens have become a way of life here.

We moved here in 1956 when the new Hwy 120 was being

constructed to replace the accident prone Old Sonora Hwy which is now Lancaster Road. Large expanse of roadway was purchased to prepare Hwy 120 for a multi-lane freeway. That was 40 years ago. It was 2 lanes then and is still 2 lanes all the way to Oakdale. There are more accidents on this new stretch of road than on the old Sonora Hwy. It is hazardous driving. I would give up driving if there were adequate transportation. There were complaints in the Oakdale Leader about the Orange Blossom turn off when it was first constructed. A few years ago an elderly couple (the Loves) were killed going West on 120 near Orange Blossom Road. The cause of the accident was termed unknown. They had family on Orange Blossom Road. Close scrutiny of traffic conditions on Hwy 120 is analogous with a need for adequate transportation east of Oakdale extending to Orange Blossom and Lancaster Rd.

I am concerned about the Andersons, an elderly couple, close neighbors just off Lancaster Rd. here. He is over 80 years old, no longer driving. He is on dialysis. His elderly wife has to drive him in for medical treatment.

People in Oakdale want Sunday transit service. The elderly don't feel comfortable depending on volunteers. I have spoken to ministers and other church people. A decided need for Sunday ROTA service was expressed. Elderly people need to get out more, than just to shop and see the doctor. Their spiritual needs are intertwined with their need for socialization.

The Oakdale Ministerial Association will be meeting the 1st of May.

East Stanislaus County needs support from SAAG We will be grateful to you for recognizing the public transportation need and giving it its due support.

Sincerely,

Bertha Olbrycht

Sam Galvan
11700 Blue Oak Ct
Oakdale, CA 95361-9566

TESS NGUYEN
SHAG
1025 15Th St
MODESTO CA
95354

95354/1101 23

To TESS NGUYEN

THIS LETTER IS INREGARD TO THE ROTA BUS SERVICE IN OUR 51st SUNSET DISTRICT. WE ARE OUT OF the CITY LIMIT, BUT STILL LIVE HERE IN OAKDALE. AS A PAST SENOIR COMMISIONER OF OAKdale FOR the PAST FOUR YEAR. I FIND IT VERY IMPORTANT AND NESSARY TO HAVE A BUS SERVICE FOR OUR SR. CITZEN IN THIS PART OF TOWN.

YOUR TRULY
Sam Galvan

APPENDIX D

The following is a handwritten letter from Doris Harbour, who resides on 28 Mile Road, north of Oakdale, who wishes to receive transit service to her house.

TESS MGUYEN
STANISLAUS AREA OF ASSOCIATION OF GOVERNMENT
1025 · 15th St.
MODESTO, CA. 95354.

March 3, 1997

TO WHOM IT MAY CONCERN;

I HAVE A PROBLEM. MY HUSBAND IS CONFINED TO A WHEELCHAIR. TAKING HIM TO A DOCTOR APPOINTMENT IS A REAL HASSEL. IT INVOLVES 4 TRANSFERS FROM THE CAR TO THE WHEELCHAIR AND IT IS A PROBLEM FINDING SOMEONE EVERY PLACE TO HELP ME WITH TRANSFER. I AM 76 AND MY HUSBAND IS 78.

WE LIVE 1/2 MILE PAST THE LIMIT THAT ROTA PROVIDES WHICH IS FOR US ON RODDEN RD. WE LIVE AT 11230 · 28 MILE RD.

HE HAS AN APPOINTMENT WITH THE DOCTOR ON THE 21st OF MARCH AT 10:00 AM.

IT WOULD BE A VERY WELCOME HELP IF IT WOULD BE POSSIBLE FOR ROTA TO COME THE EXTRA 1/2 MILE ON 28 MILE RD., SO THAT HE COULD STAY IN THE WHEEL CHAIR AND NOT HAVE TO MAKE ALL THOSE TRANSFERS. THE CHAIR LIFT ON THE BUS WOULD TAKE CARE OF THAT.

THANK YOU VERY MUCH FOR CONSIDERING THIS.

SINCERELY,
Doris Harbour

DORIS HARBOUR
11230 28 MILE RD. 847-0104
OAKDALE CA 95361

APPENDIX E

The following two letters were submitted by the ARC of Stanislaus:

1. A letter presented by Terrie Vince, of the ARC of Stanislaus with a list of five proposed unmet transit needs which it viewed as reasonable to meet.

2. A second letter from the ARC of Stanislaus, attempting to document the potential number of clients needing work.

The Arc
of Stanislaus County

Howard Training Center • 1424 Stonum Rd. • Modesto, CA 95351 • (209) 538-4000 • Fax (209) 538-6406
Production Unlimited • 213 Empire Ave. • Modesto, CA 95354 • (209) 578-1146 • Fax (209) 578-0216
Community Employment • 2105 Lancey Dr., Ste. 4 • Modesto, CA 95355 • (209) 551-6220 • Fax (209) 551-4202

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Jerry Trow, Ph.D.

Claudia K. Miller
Executive Director

March 18, 1997

SAAG
1025 Fifteenth Street
Modesto, CA 95354

Ladies & Gentlemen:

The ARC of Stanislaus County serves Disabled Persons in the County of Stanislaus. A majority of our Consumers do not drive. Many do not have Support Persons that can fill the transportation void.

Transportation is a key issue in our efforts to assist our consumers in finding employment and providing services for their needs. To find work opportunities within reasonable distance to a Consumers home would be ideal. The reality, available work crosses city and community lines. Available work extends 24 hours per day 6 to 7 days per week. Our current public transportation leaves many work opportunities out of reach.

Through the Americans with Disabilities Act, Employers must make accommodations for the Disabled. Though it is not reasonable to always expect Employers to make daytime hours available in deference to their other Employees. Traditionally, daytime hours have been a goal for Employees to work toward. It is also reasonable that the Disabled Employee be treated the same as any other Employee, in all other aspects.

#1: Increase Modesto Area Express hours 5 a.m. to 12 a.m. Monday through Friday and 6 a.m. to 10 p.m. Saturday. We have many work opportunities in many locations that could start as early as 6 a.m. and others that end at 10 p.m. or 12 a.m.

#2: Modesto Dial-a-Ride to extend service into the Business Park east of Hwy 99 in Salida. Also extend operation hours to 12 a.m. Swing shift work is available until 10 p.m. Our organization has the potential to place 10 to 15 Consumers in jobs there.

Formerly The Association for Retarded Citizens-Stanislaus

SAAG 2 March 18, 1997

#3: Increase service between Turlock and Modesto and hours of operation, 5 a.m. to 12 a.m. We currently service many Consumers from the Turlock area. Our service is limited due to limited transportation and time schedules to provide that service.

#4: Increased hours of operation 5 a.m. to 12 a.m. and increase the number of runs into the Empire area to 8 per day. Currently, there are three board and care homes operating there. A fourth one is opening soon. Increased usage could very well be on the horizon.

#5: Establishment of runs with increased hours, 5 a.m. to 12 a.m. into the Business Park area between the Airport, Yosemite Rd. and Finch Rd. The Business Park is a great resource for the future employment needs of this community. Access to the area is a major concern.

Many other opportunities are missed due to limited transportation to areas such as Ceres, Hughson, Patterson, and Riverbank. Further review would be prudent. With the changes in Welfare, many more people will require expanded transportation availability. Reviewing service areas that are concentrated in Welfare recipients would benefit current planning for future needs.

Another opportunity regards incentives to Major Employers to provide transportation for their own work force. Similar to the concept used in Agriculture for many years. A more controlled or regulated program would be required, to avoid abuses likes those created through some labor contractors. This analogy may not be the correct view to take. The idea, though, is for the Employer to take a more active role in getting Employees to the work place.

Sincerely,

Terrie Vince
Program Manager

TV/bs

The Arc
of Stanislaus County

ADMINISTRATIVE OFFICES 1424 STONUM ROAD • MODESTO, CA 95351 • (209) 538-4000

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Gary Napper

Charles Stark

Ed Williams

Claudia K. Miller
Executive Director

May 6, 1997

SAAG
1025 Fifteenth Street
Modesto, CA 95354
ATTN: J. Chip Sellers

Dear Chip:

As of this date, we offer the following information to support the five (5) issues addressed in our letter of March 18, 1997.

The ARC of Stanislaus County has not been able to place 50 to 75 potential workers at businesses due to transportation issues. These placements could have occurred in any of the potential travel routes between Modesto, Empire, Salida, Oakdale, Riverbank, and Turlock. Specific locals and numbers were not tracked.

We have approached eight (8) other Service Agencies on the five (5) points in our letter. The Private Industry Council, the Employment Development Department, Community Integration Work Program and Central Valley Training Center have responded.

EDD had not tracked any data on this subject. CIWP provides their own transportation. Valley Mountain Regional Center, United Cerebral Palsy, GAIN, and the California Senior Legislature have not responded at this time.

The information we have, at this time, is that an additional 150-200 individuals were not able to secure employment due to transportation issues county-wide. UCP indicated that they were still checking the files.

As a project to attempt at gathering more detailed information, we would like to propose the following:

1. Create a form, that all Service Agencies would complete, when there was a job access issue due to the lack of transportation.

Formerly the Association for Retarded Citizens - Stanislaus

A United Way Agency

COMMUNITY EMPLOYMENT
2105 Lancey Dr., Ste 4
Modesto, CA 95355
(209) 551-6220
Fax (209) 551-4202

HOWARD TRAINING CENTER
1424 Stonum Rd.
Modesto, CA 95351
(209) 538-4000
Fax (209) 538-6406

PRODUCTION UNLIMITED
213 Empire Ave.
Modesto, CA 95354
(209) 578-1146
Fax (209) 578-0216

COMMUNITY TRAINING
2047-A Tully
Modesto, CA 95350
(209) 521-9877

J. Chip Sellers
Page Two

May 6, 1997

2. The form would simply ask for street of client and nearest cross street. Potential job location by specific address. Reason for client being unable to travel to job location.

A. No personal vehicle
B. No public bus route
C. No Dial-a-Ride access
D. Other _____
(as discovered in future discussions)

We sincerely appreciate Chip Sellers and Tess Nguyen for their Patience, Knowledge, and Resourcefulness in addressing the issues we have proposed.

We would consider meeting on a quarterly basis, or other schedule, to work with the follow-up forms mentioned earlier. We would gladly participate. Please advise when a meeting could be scheduled to discuss this proposal.

Sincerely,

Terrie Vince
Community Employment, Program Manager
The ARC of Stanislaus County

APPENDIX F

The following are copies of the required 30 day notices for the two Unmet Transit Needs Public Hearings:

1. The first is the notice for the March 19, 1997 Public Hearing.

2. The second is the notice for the June 11, 1997 Public Hearing.

NOTICE OF PUBLIC HEARING
STANISLAUS AREA ASSOCIATION OF GOVERNMENTS (SAAG)
UNMET TRANSIT NEEDS

NOTICE IS HEREBY GIVEN, that the Stanislaus Area Association of Governments (SAAG) will hold a public hearing on Wednesday, March 19, 1997, at 7:00 p.m., in the City of Modesto, Multi-Purpose Room, Court Floor, 801 11th Street, Modesto, California, for the purpose of soliciting comments on any unmet transit needs which are reasonable to meet by establishing or contracting for new public transportation services. Comments are requested about the transportation needs of the transit dependent individuals, especially the elderly, handicapped and persons of limited means.

This is the first of two scheduled public hearings held prior to the distribution of funds under the Transportation Development Act. The Act provides that before monies for streets and roads may be approved, a determination must be made that there are no areas within the jurisdiction with unmet transit needs which can reasonably be met.

Anyone challenging the above action in court may be limited to raising only those issues which are raised at the public hearing.

All those wishing to speak will be given an opportunity to do so. Written comments received by 5:00 p.m., March 19, 1997, will be made a part of the public record.

Further information may be obtained by contacting the SAAG office, 1025 Fifteenth Street, Modesto, California, or by calling (209) 558-7830.

February 16, 1997 _____

NOTICE OF PUBLIC HEARINGS
STANISLAUS AREA ASSOCIATION
OF GOVERNMENTS (SAAG)
UNMET TRANSIT NEEDS

NOTICE IS HEREBY GIVEN, that the Stanislaus Area Association of Governments (SAAG) will hold a public hearing on Wednesday, June 11, 1997, at 7:00 p.m., in the City of Modesto Council Chambers, 801 11th Street, Modesto, California, for the purpose of soliciting comments on the draft Unmet Transit Needs Report, which will be presented to the Policy Board at that time. Comments from transit dependent individuals, especially the elderly, handicapped and others of limited means are solicited.

This is the second of two scheduled public hearings held prior to the distribution of funds under the Transportation Development Act. The Act provides that before monies for streets and roads may be approved within a jurisdiction, a determination must be made that there are no unmet transit needs within the jurisdiction which can reasonably be met.

Anyone challenging the above action in court may be limited to raising only those issues which are raised at the public hearing.

All those wishing to speak will be given an opportunity to do so. Written comments received by 5:00 p.m., June 11, 1997, will be made a part of the public record.

Further information may be obtained by contacting the SAAG office, 1025 Fifteenth Street, Modesto, CA, or by calling 558-7830.

MAY 11, 1997

APPENDIX G

The following is a sample notice for a meeting of the Social Services Transportation Advisory Council.

SAAG
Stanislaus Area
Association of Governments

1025 Fifteenth Street Modesto, CA 95354
Telephone (209) 558-7830 FAX (209) 558-7833

February 5, 1996

FOR: PUBLIC SERVICE ANNOUNCEMENT

FROM: CHIP SELLERS CS

==========

SOCIAL SERVICE TRANSPORTATION ADVISORY COUNCIL MEETING

The Social Service Transportation Advisory Council, an advisory committee to the Stanislaus Area Association of Governments (SAAG), will be holding its next monthly meeting on Thursday, March 7, 1996, in the Lower Level Training Room of the County Administration Building, located at 1100 H Street, Modesto, California. The meeting will be at 3:00 p.m.

The Council welcomes and encourages comments from anyone in the public who is concerned about the transit needs of people in Stanislaus County. The Council also invites written comments from those unable to attend the meeting. All comments will be considered for potential inclusion in the 1997/98 Unmet Transit Needs list.

Written comments may be sent to:

Attn: Chip Sellers or Tess Nguyen
SAAG
1025 15th Street
Modesto, CA 95354

For further information please contact Chip Sellers or Tess Nguyen at 558-7830.

f:c/SSTAC

APPENDIX H

The following is the text of the SAAG 1996-97 Unmet Transit Needs Policy Board Resolution.

STA[illegible]LAUS AREA ASSOCIATION OF GOVERN[illegible]NTS
RESOLUTION 95 - 61

A RESOLUTION MAKING A DETERMINATION AND FINDING
OF TRANSIT NEEDS

WHEREAS, the Stanislaus Area Association of Governments (SAAG) is designated as the Transportation Planning Agency with the responsibility to administer the Transportation Development Act (TDA), and

WHEREAS, SAAG has a Social Services Transportation Advisory Council (SSTAC), and established pursuant to Section 99238 of the TDA, and

WHEREAS, such council has met ten times during the year to obtain public input on potential unmet transit needs, and

WHEREAS, SAAG has identified the transit needs of each jurisdiction through: an annual assessment of the size and location of identifiable groups likely to be transit dependent or transit disadvantaged; an analysis of the of the adequacy of existing public transportation services and specialized transportation services; and, an analysis of potential alternative public transportation and specialized transportation services and service improvements that would meet all or part of the transit demand, and

WHEREAS, SAAG has adopted definitions of "unmet transit needs" and "reasonable to meet" in Resolution 94-39, and

WHEREAS, SAAG has held two formal, noticed, public hearings (February 14, 1996 and April 10, 1996) to solicit comments on potential unmet transit needs pursuant to Section 99238.5, and

NOW, THEREFORE, BE IT RESOLVED, that, after reviewing documentation and analyzing public comments, the Policy Board finds that:

1. There are no unmet transit needs which are reasonable to meet.

2. It has been determined that an additional hour of service in the evening, Monday through Saturday, by the Modesto Area Express (MAX) is an unmet transit need which is not reasonable to meet.

3. Other issues were identified and were determined not to be unmet transit needs.

BE IT FURTHER RESOLVED, that the above recommendations and findings are based upon the March, 1996 Draft Unmet Transit Needs Identification and Analysis, and modified by the staff report to the Policy Board regarding Unmet Transit Needs dated April 23, 1996.

BE IT FURTHER RESOLVED, that SAAG will process claims and will allocate TDA funds consistent with the above findings and with TDA Section 99401.5(e).

The foregoing Resolution was introduced at a regular meeting of the Stanislaus Area Association of Governments on the 8th day of May, 1996. A motion was made and seconded to adopt the foregoing Resolution. Motion carried and was adopted.

DATED: May 8, 1996

JAMES E. SILVIERA, CHAIRMAN

ATTEST: GARY C. DICKSON, SECRETARY

C:\OFFICE\WPWIN\CARES\UNMET\96.961

APPENDIX I

The following is a copy of SAAG Policy Board Resolution 94-39, which created the current "unmet transit needs" and "reasonable to meet" definitions.

STANISLAUS AREA ASSOCIATION OF GOVERNMENTS

RESOLUTION 94 - 39

A RESOLUTION AMENDING THE DEFINITIONS OF "UNMET TRANSIT NEEDS" AND "REASONABLE TO MEET"

WHEREAS, the Stanislaus Area Association of Governments (SAAG) is designated as the Transportation Planning Agency with the responsibility to administer the Transportation Development Act (TDA), and

WHEREAS, PUT 99401.5© requires that certain terms be adopted by resolution or in the minutes of the agency, and

WHEREAS, SAAG previously adopted such terms by Resolutions 91-11 and 93-36, and

WHEREAS, the approved SAAG Unmet Transit Needs Process calls for comprehensive review of the definitions "by SAAG, the Social Services Transportation Advisory Council (SSTAC), and other interested parties at least once every five years, or more frequently if appropriate", and

WHEREAS, the SSTAC, the Technical and Citizens Committees and the SAAG Policy Board have reviewed the existing definitions, and have recommended amendments to these definitions.

NOW, THEREFORE, BE IT RESOLVED, that the following amended definition of "Unmet Transit Needs" is hereby adopted by this Resolution:

Definition of Unmet Transit Needs: An unmet transit need is any deficiency in the system of public transit services, specialized transit/paratransit services, and private transportation services within the jurisdictions of Stanislaus County which has been identified by community members or through a local or regional planning process and which has not been funded and implemented. At a minimum, this may include desires for transportation services which are identified through the annual TDA Unmet Transit Needs hearings, by the SSTAC, in the Regional Transportation Plan, in the Short-Range Transit Plan of any transit operator, or in the compliance plan for the Americans with Disabilities Act as prepared by any public or private entity.

SAAG recognizes that public transportation includes a broad range of users, uses, and destinations. Although some services may be restricted or give priority to traditionally transit-dependent populations (such as elderly, youths, disabled, or low-income persons), all eligible users should have equivalent access or opportunity to use the service. The transportation desires of a small group of individuals or of the clients of particular agencies shall not, in and of themselves, be sufficient to justify a finding of unmet transit need.

Trips which would duplicate transportation services to the general public are not considered unmet transit needs.

A need for transportation service beyond the fiscal year under consideration shall not be considered to be an unmet transit need at the present time.

Provision of escorts or attendants is not a transit need.

BE IT FURTHER RESOLVED, that the following amended definition of "Reasonable to Meet" is hereby adopted by this Resolution:

Definition of Reasonable to Meet: An identified unmet transit need can be determined to be "reasonable to meet" if it is demonstrated, based upon SAAG staff analysis or other independent evidence, that the transit need can be met within the following performance and financial standards:

The performance standards for fixed-route systems in the urbanized area is 20% fare revenue ratio and 21 passengers per vehicle service hour.

All other systems shall achieve at least the fare revenue ratio and passenger productivity standards established in the Regional Transportation Plan or as established by statute.

An extension of service shall not cause the system of which it is a part to fail to meet the systemwide performance standards. Considered separately, it shall achieve at least half the systemwide performance standards, except in the case of an extension of service determined to be a necessary lifeline service for transit dependent populations.

The unmet transit need will not require the expenditure of more than the affected jurisdiction(s) proportional share of Transportation Development Act funds that are apportioned by SAAG on the basis of population.

The determination of whether a transit need is reasonable to meet shall also take into account as appropriate:

Likely demand for service based on transit use rates per capita in comparable communities.

Whether a service to meet the need would put the system of which it is a part in jeopardy of losing state or federal funding as a result of failing to meet mandated performance or efficiency standards.

In the case of any new general public transit services, potential Americans with Disabilities Act implications within that service area, including whether or not complementary paratransit services, if required, would impose an "undue financial burden" on the public entity.

In the case of a paratransit service provided complementary to fixed-route service by a public entity, whether meeting the need would require spending a greater amount than that required by an undue financial burden waiver approved by the Federal Transit Administration under the Americans with Disabilities Act. Opportunities for coordination among adjoining public entities or with private transportation providers and/or funding agencies. This shall include consideration of other existing resources (including financial), as well as the legal or customary responsibilities of other entities (e.g.,

social service agencies, religious organizations, schools, carpools, etc.). Duplication of other services or resources is unnecessary and not a prudent use of public funds.

An unmet transit need may be determined to be unreasonable to meet because it is not feasible to initiate service within the coming fiscal year, due to the time required for vehicle acquisition, planning, or similar timing factors, or because additional information is needed to determine whether or not the unmet transit need is reasonable to meet. An unmet transit need shall not be determined unreasonable to meet more than once on these grounds.

The fact that an identified transit need cannot be fully met based on available resources shall not be the sole reason for a finding that a transit need is not reasonable to meet.

The determination of whether an unmet transit need is reasonable to meet shall not be made by comparing unmet transit needs with the need for streets and roads.

BE IT ALSO RESOLVED, that this Resolution supersedes Resolutions 91-11 and 93-36, which previously adopted the definitions of "Unmet Transit Needs" and "Reasonable to Meet".

The foregoing Resolution was introduced at a regular meeting of the Stanislaus Area Association of Governments on the 14th day of September, 1994. A Motion was made and seconded to adopt the foregoing Resolution. Motion carried and the Resolution was adopted.

DATED: September 14, 1994

_____
Janet H. Carlsen, Chairwoman

ATTEST: _____
Greg Steel, Secretary

APPENDIX J

The following is additional analysis of the proposed transit service to the East Oakdale area, which was requested by the Stanislaus Regional Transit agency.

ADDENDUM TO THE UNMET TRANSIT NEEDS ANALYSIS FOR THE EAST OAKDALE AREA

Since the distribution of the Draft 1997/98 Unmet Transit Needs Report staff has received comments from the County regarding the analysis of the proposed service to the East Oakdale community. The following are the issues noted by County staff, followed by SAAG staff's revisions to the analysis.

On page 31, point h.i., the analysis proposes a service to East Oakdale from 9:00 a.m. to 5:00 p.m., weekdays. County staff noted that the public should not expect that the mention of these hours in the analysis is a guarantee that those will be the final service hours. SAAG staff concurs; the numbers were only intended as examples for analytical purposes.

In the same paragraph, County staff requested a recalculation of the costs to provide the proposed service, based upon the language of the current contract. At $49.38 per hour, the contracted price, and a service that operates eight hours per day, five days per week, the annual cost is $102,710. This would result in a systemwide operating cost of $1,299,422. The County further projects $131,090 in 1997-98 fare revenue, for a fare revenue ratio of 10.09%. The County assumes a 5% fare revenue ratio for the new service in this calculation, whereas the SAAG analysis assumes a 0% fare revenue ratio for the new service. At a 0% fare revenue ratio for the new service, the 1997-98 revenue drops to $125,955, and the County system-wide fare revenue ratio drops to 9.69%. This suggests that the service is less reasonable to meet by Stanislaus Regional Transit.

County staff has also requested an estimated ridership projection. To estimate the ridership SAAG staff has analyzed current ridership in the North Oaks area, currently served by ROTA, and comparable in many ways to the East Oakdale area. This area has a population of approximately 400. The ROTA operations manager, Rosemarie Rocha estimates the trips either to or from this neighborhood average about one passenger per day. With about 300 days of operations per year, this works out to a rate of approximately 0.75 passengers per resident. At this rate, the East Oakdale area would be expected to generate approximately 900 passengers per year.

SAAG staff recommends that it is reasonable to expect this area to generate at least a 5% fare revenue ratio. If the County ran the service and we assume 900 passengers per year, at $102,710 per year, this would require a fare of $5.70 per passenger. It should be noted that this is the worst case scenario, i.e., that the County has a vehicle dedicated to this service.

County staff further notes that paragraph "o", on page 34 of the Report, does not clearly address the option of the County being recognized as responsible to fund the service (the entire proposed service area is in the unincorporated County, so no other jurisdiction can be held responsible to fund this service with their TDA funds), but pay the Riverbank-Oakdale Transit Authority (ROTA) to operate the service, rather than contracting the service and having to acquire a new StaRT vehicle. The time to acquire a vehicle could delay the start of service by six to nine months.

As suggested above, there are economic benefits to both Stanislaus County and the East Oakdale area for ROTA to contract to operate the service. If ROTA operates the service, the calculation of the operating costs would be on a cost per mile rather than a cost per hour basis. It costs ROTA $2.65 per mile, and the average trip from central Oakdale to the East Oakdale area would be about 7.5 vehicle miles (the vehicle must go out to the passenger and return, and the center of the area is near Dixon and Dillwood Roads, about 3.25 miles from central Oakdale), or an average of $19.88 per trip. To generate 5% the fare would have to be a minimum of $1. A 10% fare revenue ratio (the systemwide minimum per state law) would require a $2 fare for this neighborhood.

ROTA of course has the prerogative of establishing the fare for service to this neighborhood. If there are 900 passengers per year this would suggest a cost of $18,000.

ROTA ridership records indicate that for the months of March and April there were between 4,000 and 5,000 passengers. ROTA charges a $1 fare for trips in or between Oakdale and/or Riverbank, and a $2 fare to Modesto. It is expected that the 1996/97 fare revenue ratio will be above 10%.

With this additional information, and a clarification of paragraph "o", SAAG staff continues to recommend that transit service to the East Oakdale area is an Unmet Transit Need which is Reasonable to Meet. This is not intended to be contrary from the proposal in the analysis that it is not reasonable for ROTA to meet the need, but rather as an alternative, and less expensive means by which the County can insure that the Unmet Need is met.

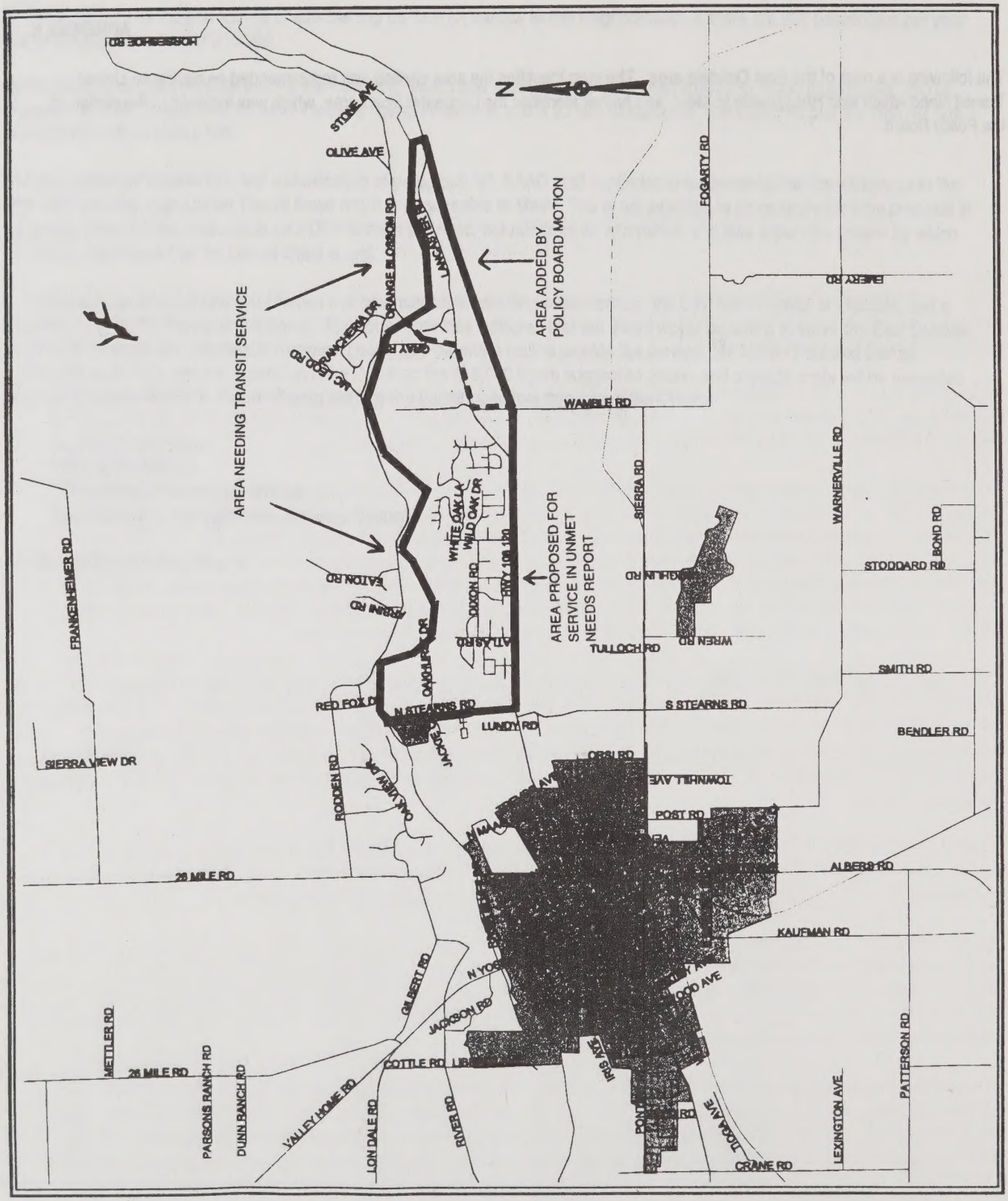
With this said, the SAAG Executive Director has communicated with Bruce Bannerman, the City Administrator of Oakdale, and a member of the ROTA Management Board. Mr. Bannerman has indicated that the Board would be willing to serve the East Oakdale area with a condition that Stanislaus Regional Transit pay the entire cost to provide the service. He further indicated that he expects the cost of the service expansion to be less than the $18,000 figure suggested above, and expects costs will be estimated based on historical methods of cost-sharing used by the transit operators throughout the County.

cc: Technical Committee
Citizens Committee
Consolidated Planning Committee
Social Services Transportation Advisory Council

c:f/1997/98 Unmet Transit Needs

APPENDIX K

The following is a map of the East Oakdale area. The map identifies the area studied and recommended as having an Unmet Transit Need which was Reasonable to Meet, and further identifies the Lancaster Road area, which was included in the motion of the Policy Board.


AREA NEEDING TRANSIT SERVICE
AREA ADDED BY POLICY BOARD MOTION
AREA PROPOSED FOR SERVICE IN UNMET NEEDS REPORT
N
HORSESHOE RD
STONE AVE
OLIVE AVE
ORANGE BLOSSOM RD
LANCASTER RD
FOGARTY RD
EMERY RD
FRANCHERIA DR
GRAY RD
MC LEOD RD
WAMBLE RD
WHITE OAK LA
WILD OAK DR
SIERRA RD
WARNERVILLE RD
BOND RD
STODDARD RD
EATON RD
ARBINI RD
DIXON RD
HWY 108 120
FRANKENHEIMER RD
TULLOCH RD
WREN RD
SMITH RD
RED FOX DR
N STEARNS RD
S STEARNS RD
LUNDY RD
BENDLER RD
SIERRA VIEW DR
ORSI RD
TOWNHILL AVE
RODDEN RD
OAK VIEW DR
POST RD
26 MILE RD
ALBERS RD
KAUFMAN RD
GILBERT RD
JACKSON RD
METTLER RD
26 MILE RD
COTTLE RD
PARSONS RANCH RD
DUNN RANCH RD
VALLEY HOME RD
LON DALE RD
RIVER RD
IRIS AVE
TIOGA AVE
CRANE RD
LEXINGTON AVE
PATTERSON RD

APPENDIX L

The following is a comment read into the record at the June 11 Unmet Transit Needs Public Hearing before the Policy Board. The comment was received by staff on June 11 from a Mr. Merritt Anderson, who was not able to attend the Public Hearing, but desired to comment regarding the proposed East Oakdale transit service.

June 11, 1997

This afternoon, a Mr. Merritt Anderson, of 12650 Lancaster Road, Oakdale called to discuss the proposed East Oakdale transit service. His house is slightly east of the intersection with Orange Blossom Road, south of the Orange Blossom Bridge. Mr. Anderson is 82 years old, and he receives dialysis three days per week in Modesto. His wife is in poor health as well, and cannot easily take him into Modesto. He expressed both excitement that the service is proposed for expansion to Orange Blossom Road and the question of whether he could receive service at his residence. He had heard that there would be a public hearing, and asked me to express his comments because he could not attend.

APPENDIX M

The following comment was heard at the June 11 Public Hearing before the Policy Board. There were four residents of the Oakdale area who attended the Policy Board meeting because of the Public Hearing and the proposed East Oakdale transit service. Only one of those people spoke, but when asked, the group as a whole indicated they agreed with the recommendations of their spokesman.

Dennis Snell, 1051 East C Street, Oakdale, Senior Advocate in the Oakdale Hospital District, stated the great need for transportation for the people no longer able to drive, especially to doctors' appointments. He spoke for the people who had signed the petition and said they hope the system will be funded as proposed. He said people, other than the elderly, have communicated the desire to have this service available.

APPENDIX N

The following is additional analysis written in response to questions from the Technical Advisory Committee and the Citizens Advisory Committee. Specifically, the City of Modesto asked for clarification of why the ARC of Stanislaus was not considered a "small group" in the analysis of whether its requests were Unmet Transit Needs. In addition, it was pointed out that the analysis of the proposal for service to the Pleasanton BART Station did not analyze service from Turlock. The following addresses those matters.

ATTACHMENT

INTRODUCTION

At the May 28 Technical and Citizens Committees three questions were asked of staff regarding the analysis included in the Draft Unmet Transit Needs Report (Draft Report). The first question, related to the recommendation that transit service to East Oakdale is an Unmet Transit Need which is Reasonable to Meet, has been addressed in the addendum distributed at the June 11 Policy Board meeting. The other two questions were:

1) The Technical Committee asked for a clarification of the reasons staff recommended that the requests made by the ARC of Stanislaus represented a large enough group to be considered an Unmet Transit Need.
2) The Citizens Committee asked if staff had analyzed the request for transit from Turlock to the Pleasanton BART station or to the San Joaquin County Transit operations to that station.

The following is the staff response to those requests.

DISCUSSION

1) The Technical Committee was correct in noting that a proposed "Unmet Transit Need" shall satisfy the following definition point:

"SAAG recognizes that public transportation includes a broad range of users, uses, and destinations. Although some services may be restricted or give priority to traditionally transit-dependent populations (such as elderly, youths, disabled, or low-income persons), all eligible users should have equivalent access or opportunity to use the service. The transportation desires of a small group of individuals or of the clients of particular agencies shall not, in and of themselves, be sufficient to justify a finding of unmet transit need."

The last sentence was intentionally designed to allow the Policy Board the latitude to make a negative finding if it determined that, for example, only one person requested a service and that person lived many miles away from existing transit. In the process of developing this sentence in the definition there was no effort to describe what should be identified as a "small group".

The analysis in the Draft Report includes four requests by the ARC of Stanislaus which staff recommends as Unmet Transit Needs. The transit goal of the ARC of Stanislaus was to provide transit to work for its clients. The initial telephone conversations with ARC of Stanislaus staff suggested to SAAG staff that over 100 ARC of Stanislaus clients were lacking transit to work, and thus not able to receive otherwise available jobs. The second letter is more specific, stating that between 50 and 75 of their clients had not been placed due to lack of transportation, and that an additional 150 to 200 clients of other social service agencies which The ARC staff had surveyed "were also not able to secure employment due to transportation issues county-wide". Lacking any official guidance for determining what is a "small" group, staff chose to consider this group large enough to recommend a finding that the four referenced proposals were Unmet Transit Needs. Staff also recommended two proposals be found not to be Unmet Transit Needs because the documentable numbers impacted were one and ten (or fewer), which in our judgement were both "small" groups. Staff

continues to recommend a finding that the four referenced proposals by the ARC of Stanislaus be found to be Unmet Transit Needs which are Unreasonable to Meet.

2) The Citizens Committee was correct in noting that staff did not analyze the proposal to provide transit from Turlock to the Pleasanton BART station or the San Joaquin County transit operations to that station. The following is a brief analysis:

A) This proposal is for transit from Stanislaus to Alameda or San Joaquin Counties. The first sentence in the Unmet Transit Needs definition is as follows: "An unmet transit need is any deficiency in the system of public transit services, specialized transit/paratransit services, and private transportation services within the jurisdictions of Stanislaus County (*underlining added*) which has been identified by community members or through a local or regional planning process and which has not been funded and implemented". Though this proposal satisfies the second sentence's requirement that it be mentioned at the Unmet Transit Needs public hearing, staff recommends a finding that it is not a proposal for transit services "within the jurisdictions of Stanislaus County", and therefore cannot be found to be an Unmet Transit Need based upon this definition point.

B) The second paragraph addresses the size of the potential ridership. Staff has reviewed the 1990 census for data regarding the employment location of Turlock residents. Noting that those who would go to the Pleasanton BART station would be expected to work in one of the Bay Area cities beyond Pleasanton which is served by BART, staff reviewed the available data. That data shows 102 Turlock residents employed in five cities along BART. Staff recommends that this is sufficiently large to recommend a finding that this is an Unmet Transit Need based on this definition point.

C) This trip would not duplicate any general public transit services, and can be found to be an Unmet Transit Need based on this point.

D) & E) do not apply to this proposal.

Staff recommends that this service not be found to be an Unmet Transit Need.

Staff typically does not continue from this point, but wishes to note that the most efficient scenario staff could envision for this service would involve the following steps:

1) Ride a bus from Turlock to Modesto;
2) Transfer to the MAX service to the SMART bus and/or the Altamont Pass Commuter Rail service;
3) Transfer to one of those services for a ride to Pleasanton;
4) Transfer to BART.

The MAX staff has tentatively developed a schedule for the service to the Altamont Train service and the SMART Express to BART service. They are as follows;

	Modesto Transit Center	Altamont Train	SMART to BART
1)	4:10 a.m.	4:45 a.m.	4:55 a.m.
2)	5:40 a.m.	6:15 a.m.	----------

	SMART to BART	Altamont Train	Modesto Transit Center
1)	----------	5:15 p.m.	5:50 p.m.
2)	6:30 p.m.	6:40 p.m.	7:15 p.m.

The Altamont Train will not go directly to the Pleasanton BART station. The Central Contra Costa Transit Authority has established a bus line from the Pleasanton BART station north to the Concord area which is expected to be extended to the Altamont Rail station when that service is initiated.

Staff proposes that the suggested service from Turlock to the BART station will involve no less than three transfers, for the earliest service, and four for the later service, including the transfer at the BART station in both cases. The earlier service would involve leaving Turlock around 3:40 a.m., and the later around 5:10 a.m. Staff is not aware of any rural transit in the State which operates at these hours. It is highly questionable whether service at the earlier hour would result in a satisfactory fare revenue ratio during the first year of operation. In addition, Turlock did not operate at its mandated fare revenue ratio in 1995-96; this is sufficient information to make a finding that the proposed service is not reasonable to meet, even if the proposal were found to be an Unmet Transit Need. (Staff applauds foresight in transit planning, but recommends that this proposal does not comply with the methods and confines of the adopted SAAG Unmet Transit Needs definition.)

c:f/Unmet Transit Needs 1997/98

APPENDIX O

The following is a copy of Resolution 97-02, stating the 1997/98 Unmet Transit Needs Findings of the SAAG Policy Board. It should be noted that the motion to adopt the following Resolution included the language, "and the Lancaster Road area". The map in Appendix K reflects that inclusion to the area found to need public transit.

STANISLAUS AREA ASSOCIATION OF GOVERNMENTS
RESOLUTION 97-02
A RESOLUTION MAKING A DETERMINATION AND FINDING OF TRANSIT NEEDS

WHEREAS, the Stanislaus Area Association of Governments (SAAG) is designated as the Transportation Planning Agency with the responsibility of administering the Transportation Development Act (TDA), and

WHEREAS, SAAG has a Social Service Transportation Advisory Council (SSTAC), established pursuant to Section 99238 of the TDA, and

WHEREAS, such council has met ten times during the year to obtain public input on unmet transit needs, and

WHEREAS, SAAG has identified the transit needs of each jurisdiction through: an annual assessment of the size and location of identifiable groups likely to be transit dependent or transit disadvantaged; an analysis of the adequacy of existing public transportation services and specialized transportation services; and, an analysis of potential alternative public transportation and specialized transportation services and service improvements that would meet all or part of the transit demand, and

WHEREAS, SAAG has adopted definitions of "unmet transit needs" and "reasonable to meet" in Resolution 94-39, and

WHEREAS, SAAG has held two formal, noticed, public hearings (March 19, 1997 and June 11, 1997) to solicit comments on potential unmet transit needs pursuant to Section 99238.5, and

NOW, THEREFORE BE IT RESOLVED, that after reviewing documentation and analyzing public comments, the Policy Board finds that:

1. There are Unmet Transit Needs including one Unmet Transit Need which is Reasonable to Meet, specifically transit service to the East Oakdale area;

2. There were four other proposed Unmet Transit Needs identified in public comments which are not reasonable to meet, specifically:

   a) Modesto Area Express (MAX) should operate from 5:00 a.m. to midnight weekdays, and 6:00 a.m. to 10:00 p.m. on Saturdays;

   b) fixed route transit should be provided to Empire weekdays to midnight and weekends to 10:00 p.m.;

   c) transit should be provided to the industrial area east of the Modesto Airport from 5:00 a.m. to midnight weekdays;

   d) the Modesto - Turlock route should be operated from 5:00 a.m. to midnight weekdays and 6:00 a.m. to 10:00 p.m. Saturdays.

Determination anad Finding of Transit Needs
Resolution 97-02
Page 2 of 2

3. Other issues were identified and were determined not to be Unmet Transit Needs.

BE IT FURTHER RESOLVED, that SAAG will process claims and allocate TDA funds consistent with the above findings and with TDA Section 99401.5(e).

The foregoing Resolution was introduced at a regular meeting of the Stanislaus Area Association of Governments on the 9th day of July, 1997. A motion was made and seconded to adopt the foregoing Resolution. Motion carried and was adopted.

DATED: July 9, 1997

KENNI FRIEDMAN, CHAIR

ATTEST:

GARY C. DICKSON, SECRETARY

U.C. BERKELEY LIBRARIES
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